

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing

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# PHA Plans

5 Year Plan for Fiscal Years 2005 - 2009

Annual Plan for Fiscal Year 2008

**NOTE: THIS PHA PLANS TEMPLATE (HUD 50075) IS TO BE COMPLETED IN  
ACCORDANCE WITH INSTRUCTIONS LOCATED IN APPLICABLE PIH NOTICES**



**PHA Plan  
Agency Identification**

**PHA Name:** Orange County Housing Authority

**PHA Number:** CA094

**PHA Fiscal Year Beginning: (mm/yyyy)** 07/2008

**PHA Programs Administered:**

☐ Public Housing and Section 8    ☒ Section 8 Only    ☐ Public Housing Only  
Number of public housing units:    Number of S8 units: 9619    Number of public housing units:  
Number of S8 units:

☐ **PHA Consortia:** (check box if submitting a joint PHA Plan and complete table)

Participating PHAs	PHA Code	Program(s) Included in the Consortium	Programs Not in the Consortium	# of Units Each Program
Participating PHA 1:				
Participating PHA 2:				
Participating PHA 3:				

**Public Access to Information**

**Information regarding any activities outlined in this plan can be obtained by contacting: (select all that apply)**

- ☒ Main administrative office of the PHA
- ☐ PHA development management offices
- ☐ PHA local offices

**Display Locations For PHA Plans and Supporting Documents**

The PHA Plans (including attachments) are available for public inspection at: (select all that apply)

- ☒ Main administrative office of the PHA
- ☐ PHA development management offices
- ☐ PHA local offices
- ☐ Main administrative office of the local government
- ☒ Main administrative office of the County government
- ☐ Main administrative office of the State government
- ☐ Public library
- ☒ PHA website

☐ Other (list below)

PHA Plan Supporting Documents are available for inspection at: (select all that apply)

- ☒ Main business office of the PHA
- ☐ PHA development management offices
- ☐ Other (list below)

**5-YEAR PLAN**  
**PHA FISCAL YEARS 2005-2009**  
[24 CFR Part 903.5]

**A. Mission**

State the PHA's mission for serving the needs of low-income, very low income, and extremely low-income families in the PHA's jurisdiction. (select one of the choices below)

- ☒ The mission of the PHA is the same as that of the Department of Housing and Urban Development: To promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination.
- ☐ The PHA's mission is: (state mission here)

**B. Goals**

The goals and objectives listed below are derived from HUD's strategic Goals and Objectives and those emphasized in recent legislation. PHAs may select any of these goals and objectives as their own, or identify other goals and/or objectives. Whether selecting the HUD-suggested objectives or their own, **PHAS ARE STRONGLY ENCOURAGED TO IDENTIFY QUANTIFIABLE MEASURES OF SUCCESS IN REACHING THEIR OBJECTIVES OVER THE COURSE OF THE 5 YEARS.** (Quantifiable measures would include targets such as: numbers of families served or PHAS scores achieved.) PHAs should identify these measures in the spaces to the right of or below the stated objectives.

**HUD Strategic Goal: Increase the availability of decent, safe, and affordable housing.**

- ☒ PHA Goal: Expand the supply of assisted housing  
Objectives:
- ☒ Apply for additional rental vouchers:
  - ☐ Reduce public housing vacancies:
  - ☒ Leverage private or other public funds to create additional housing opportunities:
  - ☐ Acquire or build units or developments
  - ☐ Other (list below)
- ☒ PHA Goal: Improve the quality of assisted housing  
Objectives:
- ☐ Improve public housing management: (PHAS score)
  - ☒ Improve voucher management: (SEMAP score)
  - ☒ Increase customer satisfaction:
  - ☐ Concentrate on efforts to improve specific management functions: (list; e.g., public housing finance; voucher unit inspections)
  - ☐ Renovate or modernize public housing units:
  - ☐ Demolish or dispose of obsolete public housing:
  - ☐ Provide replacement public housing:

- ☒ Provide replacement vouchers:
- ☐ Other: (list below)
- ☒ PHA Goal: Increase assisted housing choices
  - Objectives:
    - ☒ Provide voucher mobility counseling:
    - ☒ Conduct outreach efforts to potential voucher landlords
    - ☐ Increase voucher payment standards
    - ☐ Implement voucher homeownership program:
    - ☐ Implement public housing or other homeownership programs:
    - ☐ Implement public housing site-based waiting lists:
    - ☐ Convert public housing to vouchers:
    - ☒ Other: (list below)
  - Expand utilization of vouchers for Special Housing types as needed.

**HUD Strategic Goal: Improve community quality of life and economic vitality**

- ☐ PHA Goal: Provide an improved living environment
  - Objectives:
    - ☐ Implement measures to deconcentrate poverty by bringing higher income public housing households into lower income developments:
    - ☐ Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments:
    - ☐ Implement public housing security improvements:
    - ☐ Designate developments or buildings for particular resident groups (elderly, persons with disabilities)
    - ☐ Other: (list below)

**HUD Strategic Goal: Promote self-sufficiency and asset development of families and individuals**

- ☒ PHA Goal: Promote self-sufficiency and asset development of assisted households
  - Objectives:
    - ☐ Increase the number and percentage of employed persons in assisted families:
    - ☒ Provide or attract supportive services to improve assistance recipients' employability:
    - ☒ Provide or attract supportive services to increase independence for the elderly or families with disabilities.
    - ☐ Other: (list below)

## **HUD Strategic Goal: Ensure Equal Opportunity in Housing for all Americans**

- ☒ PHA Goal: Ensure equal opportunity and affirmatively further fair housing Objectives:
- ☒ Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and disability:
  - ☒ Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, and disability:
  - ☒ Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required:
  - ☐ Other: (list below)

### **Other PHA Goals and Objectives: (list below)**

1. Increase and preserve affordable housing opportunities, especially for those most in need.
  - a. Implement strategies to provide rental assistance benefits to an optimum number of clients and maintain a 99-100% lease-up rate.
  - b. Aggressively pursue landlord outreach activities to increase the number of participating property owners and diversity of rental units for low-income renters.





**Annual PHA Plan**  
**PHA Fiscal Year 2008**

[24 CFR Part 903.7]

**i. Annual Plan Type:**

Select which type of Annual Plan the PHA will submit.

- ☒ **Standard Plan**
- ☐ **Troubled Agency Plan**

**ii. Executive Summary of the Annual PHA Plan**

[24 CFR Part 903.7 9 @]

Provide a brief overview of the information in the Annual Plan, including highlights of major initiatives and discretionary policies the PHA has included in the Annual Plan.

The Orange County Housing Authority (OCHA) was founded in 1971 and has been designated as a Public Housing Agency (PHA) #CA094 by the U.S. Department of Housing and Urban Development (HUD).

The Orange County Board of Supervisors acts as the Board of Commissioners of OCHA and the Housing and Community Development (H&CD) Commission is the advisory board for general policy direction and oversight of housing related issues. This 11-member H&CD Commission includes two Housing Choice Voucher Program participants, five appointees by the Board of Supervisors, two representatives from the League of California Cities, and two members-at-large.

OCHA is a division within the organizational structure of the Housing and Community Services (HCS) Department and its Director is the Executive Director of OCHA. OCHA is staffed as the Housing Assistance Division of the HCS Department. Under the direction of a Division Manager, OCHA is divided into three Sections:

- 1) The Occupancy / Residency Section coordinates all phases of OCHA's Wait List including, initial opening, verification of preference status, processing initial eligibility, conducting program briefings and the issuance of a new Housing Choice Voucher. The Residential side performs all annual HUD required activities that include, annual re-certification and processing interim re-exams for reported changes.
- 2) The Rental Assistance Section performs all HUD required leasing activities, which will culminate in moving an assisted family into safe, sanitary and decent rental housing. Field staff are responsible for contact with owners, resolving tenant/landlord disputes, negotiation of rents, conducting initial move-in and annual inspections of assisted units and preparation and processing of a Lease / HAP Contract to generate monthly rental payments to owners.

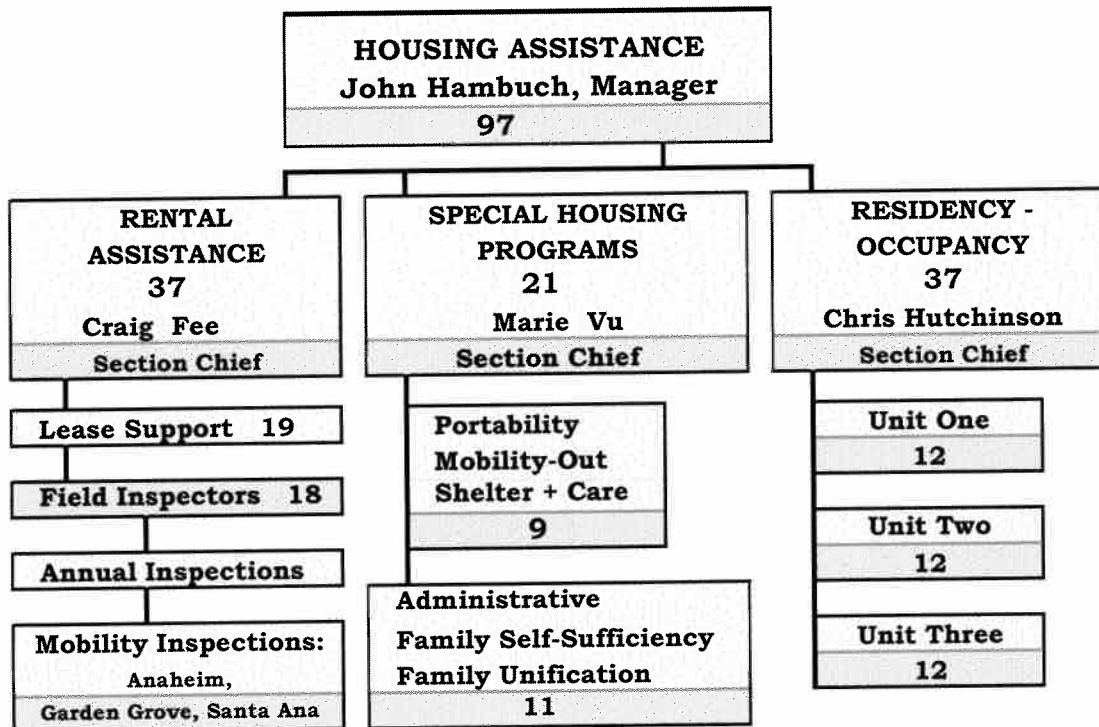
- 3) Special Housing Programs (SHP) is an administrative unit responsible for the implementation and reporting requirements for specialized HUD programs including Family Self Sufficiency, Family Unification and Shelter + Care. SHP also works in collaboration with outside agencies in coordinating inter-jurisdictional transfers for tenants moving between Housing Authorities under portability and mobility provisions, coordinates informal hearings and functions.

The following chart provides an overview of the organizational structure of the Orange County Housing Authority, which is comprised of 97 staff members. OCHA is supported by administrative staff within the Housing and Community Services Department including, accounting services, investigative services for fraud conducted by the Orange County District Attorneys Office, and computer services provided by the Information & Technology staff.



Housing & Community  
Services Department

**ORANGE COUNTY HOUSING AUTHORITY**  
**2008 Organizational Chart**



### **Housing Choice Voucher Program (HCVP):**

#### **Overview:**

During 2007, an average of 9,603 households were receiving assistance each month. Approximately 44% of assisted households were elderly, 23% were disabled, and the remainder were either very low or low-income families and single persons. Almost all assisted households resided in OCHA's jurisdiction, encompassing 31 cities and the unincorporated areas within Orange County. Over 725 assisted households used their Vouchers to receive assistance in a neighboring Housing Authority's city under an Orange County Mobility Agreement. OCHA provided continued assistance for 37 participant households who used their Voucher to move out of the county.

### **Disaster Voucher Program (DVP):**

In response to the devastation caused by Hurricane Katrina, evacuated families and individuals residing in public housing or receiving subsidized housing assistance were transitioned into HUD's emergency Disaster Voucher Program (DVP). OCHA was selected to administer DVP within Orange County and currently assists four displaced families who elected to move to the Orange County area.

### **Disaster Housing Assistance Program (DHAP):**

In July 2007, FEMA entered into an Interagency Agreement with HUD to transfer FEMA-Assisted families into a pilot program that was to be administered by local PHAs, the Disaster Housing Assistance Program (DHAP).

DHAP was designed to assist evacuees to transition from Federal rental assistance towards self-sufficiency by linking rental assistance with case management services. The services provided to assisted evacuees include job training, educational support and other relevant service needs that would help to prepare them for self-sufficiency by the time their temporary DHAP assistance terminated in March 2009. Once again, OCHA was selected by HUD to administer this program and entered into an agreement with FEMA in December 2007 to assist five eligible, displaced families under the provisions of this program.

### **Portability and Mobility:**

Under the provisions contained in HUD Portability Regulations, participant families have the right to move into the jurisdiction of an outside PHA and receive rental assistance. The PHAs that receive a portability transfer have the option of 1) administering the portable voucher and billing the initial PHA for reimbursement, or 2) absorbing the portable voucher into their own HCVP and allowing the initial PHA to re-issue the voucher to another family. During 2007, OCHA received over 223 requests from portable families requesting to move into OCHA's jurisdiction to receive rental assistance. Currently, OCHA administers 253 portability vouchers and has absorbed 10 portability vouchers into our own HCVP in 2007.

The cities of Anaheim, Garden Grove and Santa Ana each operate their own PHA within Orange County. In order to facilitate the transfer of tenants moving between jurisdictions, the four PHAs drafted a Mobility Memorandum of Understanding (MOU) that established common procedures and streamlined transfers. Currently, there are 725 OCHA tenants residing within the cities of Santa Ana, Garden Grove and Anaheim.

The following table indicates, by city, the number of each assisted household type residing within OCHA's jurisdiction, as of December 31, 2007:

<b>ASSISTED HOUSEHOLD TYPES</b>				
<b>City</b>	<b>Family</b>	<b>Disabled</b>	<b>Elderly</b>	<b>Total</b>
Aliso Viejo	16	10	13	39
Brea	18	4	135	157
Buena Park	207	123	113	443
Capistrano Beach	11	8	3	22
Costa Mesa	132	183	151	466
Cypress	42	26	52	120
Dana Point	7	17	7	31
Foothill Ranch	0	0	0	0
Fountain Valley	69	42	250	361
Fullerton	210	186	190	586
Huntington Beach	314	201	334	849
Irvine	234	167	220	621
La Habra	71	51	65	187
La Mirada	1	0	0	1
La Palma	14	3	38	55
Ladera Ranch	2	2	18	22
Laguna Beach	3	6	20	29
Laguna Hills	5	1	13	19
Laguna Niguel	21	30	62	113
Laguna Woods	1	12	63	76
Lake Forest	71	68	54	193
Los Alamitos	6	6	2	14
Midway City	72	36	145	253
Mission Viejo	64	100	115	279
Newport Beach	44	21	44	109
Orange	170	124	250	544
Placentia	62	30	69	161
Rancho Santa Margarita	24	31	51	106
San Clemente	30	31	69	130
San Juan Capistrano	10	10	48	68
Seal Beach	1	2	5	8
Silverado	1	0	0	1
Stanton	111	76	251	438
Trabuco Canyon	3	1	0	4
Tustin	142	97	113	352
Westminster	656	303	910	1869
Yorba Linda	14	8	54	76
<b>Subtotal Households Leased</b>	<b>2,859</b>	<b>2,016</b>	<b>3,927</b>	<b>8,802</b>
Portability	14	12	11	37
Mobility	314	192	272	778
<b>Total Currently Leased:</b>	<b>3,187</b>	<b>2,220</b>	<b>4,210</b>	<b>9,617</b>

**Shelter Plus Care:**

Shelter Plus Care (S+C) is a HUD homeless assistance program designed to serve homeless persons with disabilities, linking rental assistance with supportive services provided through the Orange County Health Care Agency's (HCA) network of service providers. OCHA and HCA established a collaborative partnership in which OCHA provides rental assistance to eligible clients that HCA has determined to be both disabled and homeless and has linked to supportive services. Currently, OCHA administers ten S+C grants that provides rental assistance for over 390 disabled persons.

The S+C Program is funded through grants awarded to PHAs through HUD's Continuum of Care homeless assistance competitive application process. In 2007, OCHA received over \$5,726,000 in grant funding that was allocated between one new five-year grant, and four expiring S+C projects which were renewed for an additional twelve months.

**Family Self Sufficiency and Family Unification Programs:**

The Family Self Sufficiency Program (FSS) is designed to assist Housing Choice Voucher participants in obtaining the education, job training, and other life-skills needed that will lead to an increase in household income and eliminate continued dependency upon public assistance. OCHA has partnered with a number of service providers who offer a variety of counseling and training programs to fit the needs of FSS clients that will help them reach their established goals. As participants increase their income, and pay a higher share of rent, OCHA places a portion of the rental assistance that is saved into an escrow account. During 2007, 10 FSS participants graduated with an average escrow balance of \$5,863 to start their own business, purchase a vehicle, or make a down payment on a home. As of December 2007, there were 279 current FSS participants.

**The Family Unification Program (FUP):**

FUP provides the stability of affordable housing to help reunite separated families. OCHA works in collaboration with the Social Services Agency (SSA) and was awarded 170 FUP Vouchers for families that are referred to receive rental assistance, as a condition for the reunification with their minor children.

This collaborative relationship has been a vital component to the success of FUP, which has been a viable asset to the health, welfare, and stability of families that are in need of affordable housing. Since the inception of this program, over 256 families have been reunited, and over 652 minor children have benefited from the security that comes from residential stability.

**PROGRAM MAINTENANCE & ANNUAL ACTIVITIES:****The Occupancy / Residency Section:**

The Occupancy / Residency section performed 8,934 annual recertification interviews during 2007, to review and verify tenant income and family composition. Adjustments made in the tenant's portion of rent insure that the family pays at least 30% of their annual adjusted income as their portion of the rent. Interim interviews are scheduled for tenants who report changes in income and family composition during the year. Over

4,014 Interim interviews were scheduled during 2007, resulting in a change in the tenant's portion of rent.

All tenant transactions processed resulting from an annual or interim recertification, are electronically submitted to HUD's Public and Indian Housing Information Center (PIC) and are evaluated for timeliness and accuracy. The results are included in an assessment that measures and ranks a PHA's management performance in 14 key areas of HUD's Section 8 Management Assessment Program (SEMAP).

In 2007, OCHA scored 103%, out of a possible 100%, on HUD's SEMAP ranking indicator. This achievement was accomplished, in part, through special PIC projects to reconcile OCHA tenant information with data in PIC, along with bonus points received for deconcentration. As a result, OCHA was rated as a "High Performance PHA" for the fifth successive year.

#### **The Leasing Section:**

The Leasing section was responsible for all leasing activities that generated a monthly Housing Assistance Payment (HAP) to owners and provided rental assistance for over 9,600 Housing Choice Voucher participants each month in 2007.

**New Lease/HAP Contracts:** Leasing staff completed 910 new leases and contracts for tenants who moved into a new rental unit, during 2007. In order to accomplish this task, staff scheduled and conducted a move-in inspection, and prepared and processed the "HAP" Contract that generated a Housing Assistance Payment (HAP) to the owner.

**Annual Re-inspections:** Housing Authorities are required to re-inspect each assisted unit annually to insure that it remains in safe and sanitary condition. During 2007, leasing staff performed 10,400 annual re-inspections of assisted units located throughout OCHA's jurisdiction. In addition, more than 2,500 mobility inspections were performed on behalf of Anaheim, Garden Grove and Santa Ana PHAs, for their tenants residing within OCHA's jurisdiction.

**Rent Increases:** Escalating rents in Orange County continued to impact OCHA, as staff struggled to stay current with processing an unanticipated number of rent increases. Leasing staff received over 5,400 requests for a rent increase from participating owners in the Housing Voucher Program during 2007, challenging OCHA's staffing capacity to process increases within the required sixty days.

#### **PROGRAM INTEGRITY:**

##### **DA Investigations of HCVP Violations:**

When staff suspects a tenant of program violations, a referral is made to the County's District Attorney Investigation Unit. During 2007, DA staff completed the investigation of 330 referred cases of suspected program violations. Investigative reports were completed for 285 cases where participants had committed program violations and were returned to OCHA staff for appropriate action. This may include; repayment agreements for overpayment of benefits, program suspension for a period of time, or termination from the program.

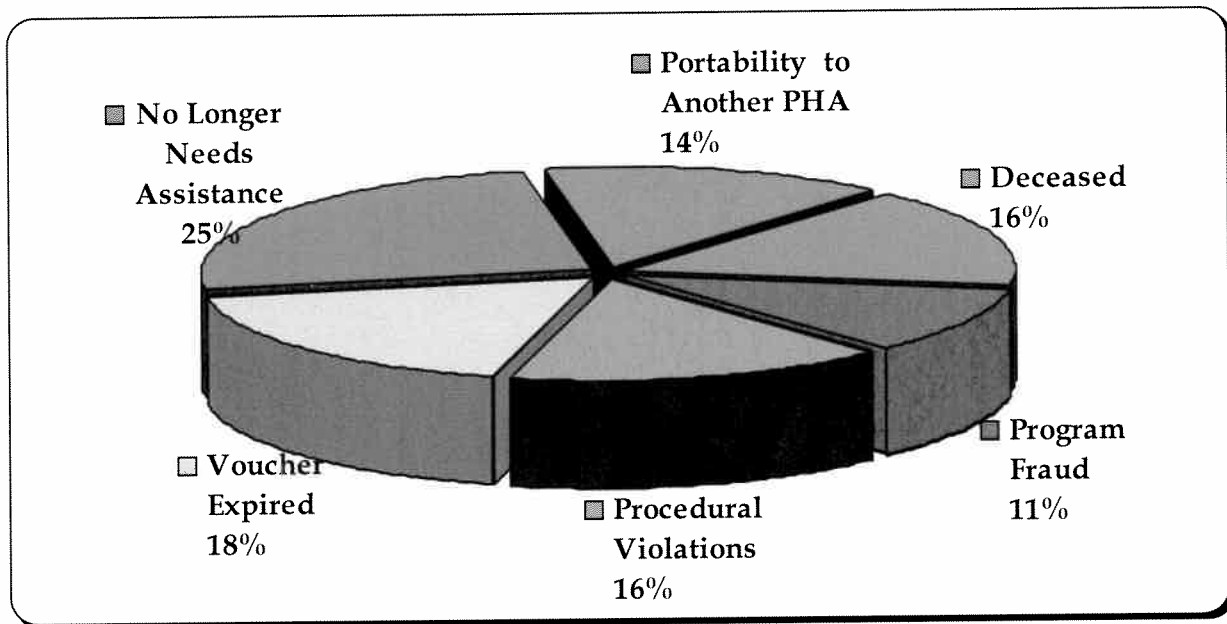
**Repayment Agreements:** As of December 31, 2007, OCHA's Accounting Department had collected \$374,290 in payments resulting from tenant Repayment Agreements and collections from owners through Small Claims Court.

**Orange County District Attorney (DA):** In addition to internal repayments, restitution and Small Claims judgments, several tenants were terminated from program participation for fraud and were subject to criminal prosecution. In 2007, OCHA received \$ 81,421 in court- ordered repayments from former tenants.

**End of Participation:**

There were 883 program terminations processed during 2007. While there are a variety of reasons why assisted tenants end their participation in OCHA's HCVP, the following chart indicates the primary causes resulting in termination:

**END- OF- PARTICIPATION**



**Informal Hearings:**

An Informal Hearing provides tenants who have been terminated from OCHA's HCVP an opportunity to present their side of the case to an independent third-party, who has no prior knowledge of the circumstances surrounding their termination and is not an OCHA staff member.

OCHA contracted with a panel of Hearing Officers and an attorney to conduct the hearings, consider the evidence presented by both staff and the tenant and make a final determination. In 2007, there were 92 Informal Hearings conducted on behalf of terminated tenants. Out of these cases, 57 program terminations were upheld. In 16 of the remaining cases, the tenant was required to enter into some form of restitution, as a condition for continued eligibility.

### **iii. Annual Plan Table of Contents**

[24 CFR Part 903.7 9 ®]

Provide a table of contents for the Annual Plan, including attachments, and a list of supporting documents available for public inspection.

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#### **Attachments**

Indicate which attachments are provided by selecting all that apply. Provide the attachment's name (A, B, etc.) in the space to the left of the name of the attachment. Note: If the attachment is provided as a **SEPARATE** file submission from the PHA Plans file, provide the file name in parentheses in the space to the right of the title.

#### **Required Attachments:**

- ☐ Admissions Policy for De-concentration
- ☐ FY 2005 Capital Fund Program Annual Statement
- ☐ Most recent board-approved operating budget (Required Attachment for PHAs that are troubled or at risk of being designated troubled ONLY)
- ☒ **(A)** List of Resident Advisory Board Members
- (E)** Resident Advisory Board Comments
- (F)** Public Comments Received at February 28, 2008 Public Hearing.
- ☐ List of Resident Board Member



- ☐ Community Service Description of Implementation
- ☐ Information on Pet Policy
- ☐ Section 8 Homeownership Capacity Statement, if applicable
- ☐ Description of Homeownership Programs, if applicable

Optional Attachments:

- ☒ (B) PHA Management Organizational Chart
- ☐ FY 2005 Capital Fund Program 5-Year Action Plan
- ☐ Public Housing Drug Elimination Program (PHDEP) Plan
- ☐ Comments of Resident Advisory Board or Boards (must be attached if not included in PHA Plan text)
- ☒ (C) Other: Statement of Accomplishments Toward the Goals & Objects of OCHA's 2005-2009 Five-Year Plan
- (D) Other: OCHA Statement of Activities in support of the VAWA Act

**Supporting Documents Available for Review**

Indicate which documents are available for public review by placing a mark in the "Applicable & On Display" column in the appropriate rows. All listed documents must be on display if applicable to the program activities conducted by the PHA.

<b>List of Supporting Documents Available for Review</b>		
<b>Applicable &amp; On Display</b>	<b><u>Supporting Document</u></b>	<b>Applicable Plan Component</b>
X	PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations	5 Year and Annual Plans
X	State/Local Government Certification of Consistency with the Consolidated Plan	5 Year and Annual Plans
X	Fair Housing Documentation: Records reflecting that the PHA has examined its programs or proposed programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available, and worked or is working with local jurisdictions to implement any of the jurisdictions' initiatives to affirmatively further fair housing that require the PHA's involvement.	5 Year and Annual Plans
X	Consolidated Plan for the jurisdiction/s in which the PHA is located (which includes the Analysis of Impediments to Fair Housing Choice (AI)) and any additional backup data to support statement of housing needs in the jurisdiction	Annual Plan: Housing Needs
NA	Most recent board-approved operating budget for the public housing program	Annual Plan: Financial Resources;
NA	Public Housing Admissions and (Continued) Occupancy Policy (A&O), which includes the Tenant Selection and Assignment Plan [TSAP]	Annual Plan: Eligibility, Selection, and Admissions Policies
	Section 8 Administrative Plan	Annual Plan: Eligibility,

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
X		Selection, and Admissions Policies
NA	Public Housing De-concentration and Income Mixing Documentation: 1. PHA board certifications of compliance with de-concentration requirements (section 16(a) of the US Housing Act of 1937, as implemented in the 2/18/99 <i>Quality Housing and Work Responsibility Act Initial Guidance; Notice</i> and any further HUD guidance) and 2. Documentation of the required de-concentration and income mixing analysis	Annual Plan: Eligibility, Selection, and Admissions Policies
NA	Public housing rent determination policies, including the methodology for setting public housing flat rents <input type="checkbox"/> Check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
NA	Schedule of flat rents offered at each public housing development <input type="checkbox"/> Check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Section 8 rent determination (payment standard) policies <input checked="" type="checkbox"/> Check here if included in Section 8 Administrative Plan	Annual Plan: Rent Determination
NA	Public housing management and maintenance policy documents, including policies for the prevention or eradication of pest infestation (including cockroach infestation)	Annual Plan: Operations and Maintenance
NA	Public housing grievance procedures <input type="checkbox"/> Check here if included in the public housing A & O Policy	Annual Plan: Grievance Procedures
X	Section 8 informal review and hearing procedures <input checked="" type="checkbox"/> Check here if included in Section 8 Administrative Plan	Annual Plan: Grievance Procedures
NA	The HUD-approved Capital Fund/Comprehensive Grant Program Annual Statement (HUD 52837) for the active grant year	Annual Plan: Capital Needs
NA	Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grant	Annual Plan: Capital Needs
NA	Most recent, approved 5 Year Action Plan for the Capital Fund/Comprehensive Grant Program, if not included as an attachment (provided at PHA option)	Annual Plan: Capital Needs
NA	Approved HOPE VI applications or, if more recent, approved or submitted HOPE VI Revitalization Plans or any other approved proposal for development of public housing	Annual Plan: Capital Needs
NA	Approved or submitted applications for demolition and/or disposition of public housing	Annual Plan: Demolition and Disposition
NA	Approved or submitted applications for designation of public housing (Designated Housing Plans)	Annual Plan: Designation of Public Housing
	Approved or submitted assessments of reasonable	Annual Plan: Conversion of

<b>List of Supporting Documents Available for Review</b>		
<b>Applicable &amp; On Display</b>	<b><u>Supporting Document</u></b>	<b>Applicable Plan Component</b>
NA	revitalization of public housing and approved or submitted conversion plans prepared pursuant to section 202 of the 1996 HUD Appropriations Act	Public Housing
NA	Approved or submitted public housing homeownership programs/plans	Annual Plan: Homeownership
X	Policies governing any Section 8 Homeownership program <input checked="" type="checkbox"/> Check here if included in the Section 8 Administrative Plan	Annual Plan: Homeownership
X	Any cooperative agreement between the PHA and the TANF agency	Annual Plan: Community Service & Self-Sufficiency
X	FSS Action Plan/s for public housing and/or Section 8	Annual Plan: Community Service & Self-Sufficiency
X	Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program reports	Annual Plan: Community Service & Self-Sufficiency
NA	The most recent Public Housing Drug Elimination Program (PHDEP) semi-annual performance report for any open grant and most recently submitted PHDEP application (PHDEP Plan)	Annual Plan: Safety and Crime Prevention
X	The most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h)), the results of that audit and the PHA's response to any findings	Annual Plan: Annual Audit
NA	Troubled PHAs: MOA/Recovery Plan	Troubled PHAs
NA	Other supporting documents (optional) (List individually; use as many lines as necessary)	(Specify as needed)

# **1. Statement of Housing Needs**

[24 CFR Part 903.7 9 (a)]

## **A. Housing Needs of Families in the Jurisdiction/s Served by the PHA**

Based upon the information contained in the Consolidated Plan/s applicable to the jurisdiction, and/or other data available to the PHA, provide a statement of the housing needs in the jurisdiction by completing the following table. In the "Overall" Needs column, provide the estimated number of renter families that have housing needs. For the remaining characteristics, rate the impact of that factor on the housing needs for each family type, from 1 to 5, with 1 being "no impact" and 5 being "severe impact." Use N/A to indicate that no information is available upon which the PHA can make this assessment.

<b>Housing Needs of Families in the Jurisdiction</b> <b>By Family Type</b>							
Family Type	Overall	Afford- ability	Supply	Quality	Access- ibility	Size	Locatio n
Income <= 30% of AMI	39,658	5	5	4	4	4	4
Income >30% but <=50% of AMI	37,036	5	4	4	4	4	4
Income >50% but <80% of AMI	52,682	4	3	3	3	3	3
Elderly	20,454	5	5	4	5	4	4
Families with Disabilities	270,298	5	5	4	5	4	4
Hispanic	52,001	5	5	4	5	4	4
Non- Hispanic/White	153,810	5	5	4	5	4	4
Asian	29,341	5	5	4	5	4	4
Black	6,204	5	5	4	5	4	4

What sources of information did the PHA use to conduct this analysis? (Check all that apply; all materials must be made available for public inspection.)

- ☐ Consolidated Plan of the Jurisdiction/s  
Indicate year:
- ☒ U.S. Census data: the Comprehensive Housing Affordability Strategy ("CHAS") dataset 2000.
- ☐ American Housing Survey data  
Indicate year:
- ☐ Other housing market study  
Indicate year:
- ☒ Other sources: (list and indicate year of information)
  - Orange County 2007 Community Indicators

## B. Housing Needs of Families on the Public Housing and Section 8 Tenant- Based Assistance Waiting Lists

State the housing needs of the families on the PHA's waiting list/s. **Complete one table for each type of PHA-wide waiting list administered by the PHA.** PHAs may provide separate tables for site-based or sub-jurisdictional public housing waiting lists at their option.

<b>Housing Needs of Families on the Waiting List</b>			
This information is current for the calendar year ending December 31, 2007.			
Waiting list type: (select one)			
<input checked="" type="checkbox"/>	Section 8 tenant-based assistance		
<input type="checkbox"/>	Public Housing		
<input type="checkbox"/>	Combined Section 8 and Public Housing		
<input type="checkbox"/>	Public Housing Site-Based or sub-jurisdictional waiting list (optional)		
If used, identify which development/sub jurisdiction:			
	# Of families	% Of total families	Annual Turnover
Waiting list total	13,270		3,101
Extremely low income <=30% AMI	10,640	80%	
Very low income (>30% but <=50% AMI)	2,294	18%	
Low income (>50% but <80% AMI)	291	2%	
Families with children	4,980	38%	
Elderly families	3,560	27%	
Families with Disabilities	3,468	26%	
Ethnicity: Hispanic	2,769	21%	
Ethnicity: Non-Hispanic	10,501	79%	
Not Reported	18	<1%	
Race: Am Indian / Alaska Native	352	3%	
Race: Asian	5,613	42%	
Race: Black/African American	1,309	10%	
Race: Native Hawaiian/Pacific Islander	1	<1%	
Race: White	5,969	45%	

<b>Housing Needs of Families on the Waiting List</b> This information is current for the calendar year ending December 31, 2007.			
Characteristics by Bedroom Size (Public Housing Only)			
1BR	NA		
2 BR	NA		
3 BR	NA		
4 BR	NA		
5 BR	NA		
5+ BR	NA		
Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes If yes: How long has it been closed (# of months)? 25 Does the PHA expect to reopen the list in the PHA Plan year? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

### C. Strategy for Addressing Needs

Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list **IN THE UPCOMING YEAR**, and the Agency's reasons for choosing this strategy.

#### (1) Strategies

**Need: Shortage of affordable housing for all eligible populations**

**Strategy 1. Maximize the number of affordable units available to the PHA within its current resources by:**

Select all that apply

- ☐ Employ effective maintenance and management policies to minimize the number of public housing units off-line
- ☐ Reduce turnover time for vacated public housing units
- ☐ Reduce time to renovate public housing units
- ☐ Seek replacement of public housing units lost to the inventory through mixed finance development
- ☐ Seek replacement of public housing units lost to the inventory through section 8 replacement housing resources
- ☐ Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction
- ☒ Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required

- ☒ Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
- ☒ Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program
- ☒ Participate in the Consolidated Plan development process to ensure coordination with broader community strategies
- ☐ Other (list below)

**Strategy 2: Increase the number of affordable housing units by:**

Select all that apply

- ☒ Apply for additional section 8 units should they become available
- ☒ Leverage affordable housing resources in the community through the creation of mixed - finance housing
- ☒ Pursue housing resources other than public housing or Section 8 tenant-based assistance.
- ☐ Other: (list below)

**Need: Specific Family Types: Families at or below 30% of median**

**Strategy 1: Target available assistance to families at or below 30 % of AMI**

Select all that apply

- ☐ Exceed HUD federal targeting requirements for families at or below 30% of AMI in public housing
- ☒ Exceed HUD federal targeting requirements for families at or below 30% of AMI in tenant-based section 8 assistance
- ☐ Employ admissions preferences aimed at families with economic hardships
- ☐ Adopt rent policies to support and encourage work
- ☐ Other: (list below)

**Need: Specific Family Types: Families at or below 50% of median**

**Strategy 1: Target available assistance to families at or below 50% of AMI**

Select all that apply

- ☒ Employ admissions preferences aimed at families who are working
- ☐ Adopt rent policies to support and encourage work
- ☐ Other: (list below)

**Need: Specific Family Types: The Elderly**

**Strategy 1: Target available assistance to the elderly:**

Select all that apply

- ☐ Seek designation of public housing for the elderly
- ☒ Apply for special-purpose vouchers targeted to the elderly, should they become available
- ☒ Other: (list below)
  - Working Preference: “Elderly applicants are given a preference equal to “working families” on the Wait List.

**Need: Specific Family Types: Families with Disabilities**

**Strategy 1: Target available assistance to Families with Disabilities:**

Select all that apply

- ☐ Seek designation of public housing for families with disabilities
- ☐ Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing
- ☒ Apply for special-purpose vouchers targeted to families with disabilities, should they become available
- ☒ Affirmatively market to local non-profit agencies that assist families with disabilities
- ☒ Other: (list below)
  - Working Preference: “Disabled” applicants are given a preference equal to “working families” on the Wait List.
  - Pursue working relationships with community-based organizations to assist families with disabilities in applying for, complying with the rules and regulations of, and maintaining rental assistance.

**Need: Specific Family Types: Races or ethnicities with disproportionate housing needs**

**Strategy 1: Increase awareness of PHA resources among families of races and ethnicities with disproportionate needs:**

Select if applicable

- ☒ Affirmatively market to races/ethnicities shown to have disproportionate housing needs
- ☒ Other: (list below)



- OCHA publishes in three publications the availability of the “opened waiting list” period. Additional publications are made available in local newspapers in the following languages: English, Spanish and Vietnamese.

**Strategy 2: Conduct activities to affirmatively further fair housing**

Select all that apply

- ☒ Counsel section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units
- ☒ Market the section 8 program to owners outside of areas of poverty /minority concentrations
- ☐ Other: (list below)

**Other Housing Needs & Strategies: (list needs and strategies below)**

**(2) Reasons for Selecting Strategies**

Of the factors listed below, select all that influenced the PHA’s selection of the strategies it will pursue:

- ☒ Funding constraints
- ☒ Staffing constraints
- ☐ Limited availability of sites for assisted housing
- ☐ Extent to which particular housing needs are met by other organizations in the community
- ☒ Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA
- ☒ Influence of the housing market on PHA programs
- ☐ Community priorities regarding housing assistance
- ☒ Results of consultation with local or state government
- ☒ Results of consultation with residents and the Resident Advisory Board
- ☐ Results of consultation with advocacy groups
- ☐ Other: (list below)

## **2. Statement of Financial Resources**

[24 CFR Part 903.7 9 (b)]

List the financial resources that are anticipated to be available to the PHA for the support of Federal public housing and tenant-based Section 8 assistance programs administered by the PHA during the Plan year.

Note: the table assumes that Federal public housing or tenant based Section 8 assistance grant funds are expended on eligible purposes; therefore, uses of these funds need not be stated. For other funds, indicate the use for those funds as one of the following categories: public housing operations, public housing capital improvements, public housing safety/security, public housing supportive services, Section 8 tenant-based assistance, Section 8 supportive services or other.

<b>Financial Resources: Planned Sources and Uses</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>1. Federal Grants (FY 2008 grants)</b>	NA	
a) Public Housing Operating Fund	NA	
b) Public Housing Capital Fund	NA	
c) HOPE VI Revitalization	NA	
d) HOPE VI Demolition	NA	
e) Annual Contributions for Section 8 Tenant-Based Assistance	\$105,010,753	
f) Public Housing Drug Elimination Program (including any Technical Assistance funds)	NA	
g) Resident Opportunity and Self-Sufficiency Grants	NA	
h) FSS HOP Coordinator	\$124,913	
i) Community Development Block Grant	NA	
j) HOME	NA	
Other Federal Grants (list below)		
<b>2. Prior Year Federal Grants (un-obligated funds only) (list below)</b>	NA	
<b>3. Public Housing Dwelling Rental Income</b>	NA	
<b>4. Other income</b> (list below)	NA	
<b>5. Non-federal sources</b> (list below)		
FSS Enhancement	\$50,000	Supportive services for FSS participants only.
<b>Total resources</b>	<b>\$105,185,666</b>	

### **3. PHA Policies Governing Eligibility, Selection, and Admissions**

[24 CFR Part 903.7 9 (c)]

#### **A. Public Housing**

Exemptions: PHAs that do not administer public housing are not required to complete subcomponent 3A.

- OCHA does not administer public housing.

#### **(1) Eligibility**

a. **(NA)** When does the PHA verify eligibility for admission to public housing? (Select all that apply)

- ☐ When families are within a certain number of being offered a unit: (state number)
- ☐ When families are within a certain time of being offered a unit: (state time)
- ☐ Other: (describe)

b. **(NA)** Which non-income (screening) factors does the PHA use to establish eligibility for admission to public housing (select all that apply)?

- ☐ Criminal or Drug-related activity
- ☐ Rental history
- ☐ Housekeeping
- ☐ Other (describe)

c. ☐ Yes ☐ No: **(NA)** Does the PHA request criminal records from local law enforcement agencies for screening purposes?

d. ☐ Yes ☐ No: **(NA)** Does the PHA request criminal records from State law enforcement agencies for screening purposes?

e. ☐ Yes ☐ No: **(NA)** Does the PHA access FBI criminal records from the FBI for screening purposes?

#### **(2) Waiting List Organization**

a. **(NA)** Which methods does the PHA plan to use to organize its public housing waiting list (select all that apply)

- ☐ Community-wide list
- ☐ Sub-jurisdictional lists
- ☐ Site-based waiting lists
- ☐ Other (describe)

b. **(NA)** Where may interested persons apply for admission to public housing?

- ☐ PHA main administrative office
- ☐ PHA development site management office
- ☐ Other (list below)

If the PHA plans to operate one or more site-based waiting lists in the coming year, answer each of the following questions; if not, skip to subsection

**(3) Assignment**

1. **(NA)** How many site-based waiting lists will the PHA operate in the coming year?
2. ☐ Yes ☐ No: **(NA)** Are any or all of the PHA's site-based waiting lists new for the upcoming year (that is, they are not part of a previously-HUD-approved site based waiting list plan)?  
If yes, how many lists?
3. ☐ Yes ☐ No: **(NA)** May families are on more than one list simultaneously  
If yes, how many lists?
4. **(NA)** Where can interested persons obtain more information about and sign up to be on the site-based waiting lists (select all that apply)?
  - ☐ PHA main administrative office
  - ☐ All PHA development management offices
  - ☐ Management offices at developments with site-based waiting lists
  - ☐ At the development to which they would like to apply
  - ☐ Other (list below)

**(3) Assignment**

- a. **(NA)** How many vacant unit choices are applicants ordinarily given before they fall to the bottom of or are removed from the waiting list? (Select one)
  - ☐ One
  - ☐ Two
  - ☐ Three or More
- b. ☐ Yes ☐ No: **(NA)** Is this policy consistent across all waiting list types?
- c. **(NA)** If answer to b is no, list variations for any other than the primary public housing waiting list/s for the PHA:

**(4) Admissions Preferences**

- a. Income targeting:
  - ☐ Yes ☐ No: **(NA)** Does the PHA plan to exceed the federal targeting requirements by targeting more than 40% of all new admissions to public housing to families at or below 30% of median area income?
- b. Transfer policies:  
**(NA)** In what circumstances will transfers take precedence over new admissions?
  - ☐ Emergencies
  - ☐ Over housed
  - ☐ Under housed
  - ☐ Medical justification
  - ☐ Administrative reasons determined by the PHA (permit modernization work)

- ☐ Resident choice: (state circumstances below)
- ☐ Other: (list below)

c. Preferences

1. ☐ Yes ☐ No: **(NA)** Has the PHA established preferences for admission to public housing (other than date and time of application)? (If “no” is selected, skip to subsection **(5) Occupancy**)
2. **(NA)** Which of the following admission preferences does the PHA plan to employ in the coming year? (Select all that apply from either former Federal preferences or other preferences)

Former Federal preferences:

- ☐ Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- ☐ Victims of domestic violence
- ☐ Substandard housing
- ☐ Homelessness
- ☐ High rent burden (rent is > 50 percent of income)

Other preferences: (select below)

- ☐ Working families and those unable to work because of age or disability
- ☐ Veterans and veterans’ families
- ☐ Residents who live and/or work in the jurisdiction
- ☐ Those enrolled currently in educational, training, or upward mobility programs
- ☐ Households that contribute to meeting income goals (broad range of incomes)
- ☐ Households that contribute to meeting income requirements (targeting)
- ☐ Those previously enrolled in educational, training, or upward mobility programs
- ☐ Victims of reprisals or hate crimes
- ☐ Other preference(s) (list below)

3. **(NA)** If the PHA will employ admissions preferences, please prioritize by placing a “1” in the space that represents your first priority, a “2” in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either through an absolute hierarchy or through a point system), place the same number next to each. That means you can use “1” more than once, “2” more than once, etc.

Date and Time

Former Federal preferences:

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness

High rent burden

Other preferences (select all that apply)

- ☐ Working families and those unable to work because of age or disability
- ☐ Veterans and veterans' families
- ☐ Residents who live and/or work in the jurisdiction
- ☐ Those enrolled currently in educational, training, or upward mobility programs
- ☐ Households that contribute to meeting income goals (broad range of incomes)
- ☐ Households that contribute to meeting income requirements (targeting)
- ☐ Those previously enrolled in educational, training, or upward mobility programs
- ☐ Victims of reprisals or hate crimes
- ☐ Other preference(s) (list below)

4. **(NA)** Relationship of preferences to income targeting requirements:

- ☐ The PHA applies preferences within income tiers
- ☐ Not applicable: the pool of applicant families ensures that the PHA will meet income-targeting requirements

**(5) Occupancy**

a. **(NA)** What reference materials can applicants and residents use to obtain information about the rules of occupancy of public housing

- ☐ The PHA-resident lease
- ☐ The PHA's Admissions and (Continued) Occupancy policy
- ☐ PHA briefing seminars or written materials
- ☐ Other source (list)

b. **(NA)** How often must residents notify the PHA of changes in family composition?

- ☐ At an annual reexamination and lease renewal
- ☐ Any time family composition changes
- ☐ At family request for revision
- ☐ Other (list)

**(6) Deconcentration and Income Mixing**

a. ☐ Yes ☐ No: **(NA)** Did the PHA's analysis of its family (general occupancy) developments to determine concentrations of poverty indicate the need for measures to promote de-concentration of poverty or income mixing?

b. ☐ Yes ☐ No: **(NA)** Did the PHA adopt any changes to its admissions policies based on the results of the required analysis of the need to promote de-concentration of poverty or to assure income mixing?

c. (NA) If the answer to b was yes, what changes were adopted? (select all that apply)

- ☐ Adoption of site-based waiting lists  
If selected, list targeted developments below:
- ☐ Employing waiting list “skipping” to achieve de-concentration of poverty or income mixing goals at targeted developments  
If selected, list targeted developments below:
- ☐ Employing new admission preferences at targeted developments  
If selected, list targeted developments below:
- ☐ Other (list policies and developments targeted below)

d. ☐ Yes ☐ No: (NA) Did the PHA adopt any changes to **other** policies based on the results of the required analysis of the need for de-concentration of poverty and income mixing?

e. (NA) If the answer to d was yes, how would you describe these changes?

- ☐ Additional affirmative marketing
- ☐ Actions to improve the marketability of certain developments
- ☐ Adoption or adjustment of ceiling rents for certain developments
- ☐ Adoption of rent incentives to encourage de-concentration of poverty and income-mixing.
- ☐ Other (list below)

f. (NA) Based on the results of the required analysis, in which developments will the PHA make special efforts to attract or retain higher-income families?

- ☐ Not applicable: results of analysis did not indicate a need for such efforts
- ☐ List (any applicable) developments below:

g. (NA) Based on the results of the required analysis, in which developments will the PHA make special efforts to assure access for lower-income families?

- ☐ Not applicable: results of analysis did not indicate a need for such efforts
- ☐ List (any applicable) developments below:

## B. Section 8

Exemptions: PHAs that do not administer section 8 are not required to complete sub-component 3B.

**Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).**

### (1) Eligibility

a. What is the extent of screening conducted by the PHA?(select all that apply)

- ☒ Criminal or drug-related activity only to the extent required by law or regulation
- ☒ Criminal and drug-related activity, more extensively than required by law or regulation.
- ☐ More general screening than criminal and drug-related activity (list factors below)

☒ Other (list below)

- OCHA contracts with the County of Orange, Office of the District Attorney to conduct investigations of fraudulent activities and program abuse.

b. ☒ Yes ☐ No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?

c. ☐ Yes ☒ No: Does the PHA request criminal records from State law enforcement agencies for screening purposes?

d. ☐ Yes ☒ No: Does the PHA access FBI criminal records from the FBI for screening purposes?(either directly or through an NCIC-authorized source)

e. Indicate what kinds of information you share with prospective landlords?

☐ Criminal or drug-related activity

☒ Other (describe below)

- Name and telephone number of last two known landlords upon request.

## **(2) Waiting List Organization**

a. With which of the following program waiting lists is the section 8 tenant-based assistance waiting list merged? (select all that apply)

- ☒ None  
☐ Federal public housing  
☐ Federal moderate rehabilitation  
☐ Federal project-based certificate program  
☐ Other federal or local program (list below)

b. Where may interested persons apply for admission to section 8 tenant-based assistance? (select all that apply )

- ☒ PHA main administrative office  
☒ Other (list below)

- During an open enrollment period, applicants may obtain applications for the rental assistance program at local city halls, libraries and additional distribution sites. Applicants have also been able to submit applications on the County website.

## **(3) Search Time**



- a. ☒ Yes ☐ No: Does the PHA give extensions on standard 60-day period to search for a unit?

If yes, state circumstances below:

- A standard 120-day period is given for all vouchers issued. Additional extensions may be granted for reasonable accommodation of disabled clients or for hard-ship cases, approved on a case-by-case basis.

#### **(4) Admissions Preferences**

a. Income targeting

- ☐ Yes ☒ No: Does the PHA plan to exceed the federal targeting requirements by targeting more than 75% of all new admissions to the section 8 program to families at or below 30% of median area income?

b. Preferences

1. ☒ Yes ☐ No: Has the PHA established preferences for admission to section 8 tenant-based assistance? (other than date and time of application) (if no, skip to subcomponent **(5) Special purpose section 8 assistance programs**)
2. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)

Former Federal preferences

- ☐ Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- ☐ Victims of domestic violence
- ☐ Substandard housing
- ☐ Homelessness
- ☐ High rent burden (rent is > 50 percent of income)

Other preferences (select all that apply)

- ☒ Working families and those unable to work because of age or disability
- ☒ Veterans and veterans' families
- ☒ Residents who live and/or work in your jurisdiction
- ☐ Those enrolled currently in educational, training, or upward mobility programs
- ☐ Households that contribute to meeting income goals (broad range of incomes)
- ☐ Households that contribute to meeting income requirements (targeting)
- ☐ Those previously enrolled in educational, training, or upward mobility programs
- ☐ Victims of reprisals or hate crimes
- ☒ Other preference(s) (list below)

- Involuntary displacement by government action or for reasons of health or safety in OCHA's participating jurisdiction.
- In the event of a federally declared disaster, OCHA may designate Housing Choice Vouchers to be made available for eligible displaced households.

3. If the PHA will employ admissions preferences, please prioritize by placing a "1" in the space that represents your first priority, a "2" in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either through an absolute hierarchy or through a point system), place the same number next to each. That means you can use "1" more than once, "2" more than once, etc.

Date and Time

Former Federal preferences

Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)  
 Victims of domestic violence  
 Substandard housing  
 Homelessness  
 High rent burden

Other preferences (select all that apply)

- 2 Working families and those unable to work because of age or disability  
 2 Veterans and veterans' families  
 2 Residents who live and/or work in your jurisdiction  
☐ Those enrolled currently in educational, training, or upward mobility programs  
☐ Households that contribute to meeting income goals (broad range of incomes)  
☐ Households that contribute to meeting income requirements (targeting)  
☐ Those previously enrolled in educational, training, or upward mobility programs  
☐ Victims of reprisals or hate crimes  
☒ Other preference(s) (list below)

- Involuntary displacement by government action or for reasons of health or safety in OCHA's participating jurisdiction.

4. Among applicants on the waiting list with equal preference status, how are applicants selected?

- ☐ Date and time of application  
☒ Drawing (lottery) or other random choice technique

5. If the PHA plans to employ preferences for “residents who live and/or work in the jurisdiction” (select one)

- ☒ This preference has previously been reviewed and approved by HUD  
☐ The PHA requests approval for this preference through this PHA Plan

6. Relationship of preferences to income targeting requirements: (select one)

- ☐ The PHA applies preferences within income tiers  
☒ Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

#### **(5) Special Purpose Section 8 Assistance Programs**

a. In which documents or other reference materials are the policies governing eligibility, selection, and admissions to any special-purpose section 8 program administered by the PHA contained?

- ☒ The Section 8 Administrative Plan  
☒ Briefing sessions and written materials  
☒ Other (list below)

- Eligibility information brochures, application instructions and Housing & Community Services website.

b. How does the PHA announce the availability of any special-purpose section 8 programs to the public?

- ☐ Through published notices  
☒ Other (list below)

- OCHA works in collaboration with outside agencies who provide referrals from targeted populations with special needs who are eligible to participate in the Family Unification Program and Shelter Plus Care Program.

#### **4. PHA Rent Determination Policies**

[24 CFR Part 903.7 9 (d)]

- OCHA does not administer public housing.

#### **A. Public Housing**

Exemptions: PHAs that do not administer public housing are not required to complete sub-component 4A.

- OCHA does not administer public housing.

#### **(1) Income Based Rent Policies**

Describe the PHA’s income based rent setting policy/ies for public housing using, including discretionary (that is, not required by statute or regulation) income disregards and exclusions, in the appropriate spaces below.

a. (NA) Use of discretionary policies: (select one)

- ☐ **(NA)** The PHA will not employ any discretionary rent-setting policies for income-based rent in public housing. Income-based rents are set at the higher of 30% of adjusted monthly income, 10% of unadjusted monthly income, the welfare rent, or minimum rent (less HUD mandatory deductions and exclusions). (If selected, skip to sub-component (2))
- ☐ **(NA)** The PHA employs discretionary policies for determining income-based rent (If selected, continue to question b.)

**b. Minimum Rent**

1. **(NA)** What amount best reflects the PHA's minimum rent?

- ☐ \$0
- ☐ \$1-\$25
- ☐ \$26-\$50

2. ☐ Yes ☐ No: **(NA)** Has the PHA adopted any discretionary minimum rent hardship exemption policies?

3. **(NA)** If yes to question 2, list these policies below:

**c. (NA) Rents set at less than 30% than adjusted income**

1. ☐ Yes ☐ No: **(NA)** Does the PHA plan to charge rents at a fixed amount or percentage less than 30% of adjusted income?

2. **(NA)** If yes to above, list the amounts or percentages charged and the circumstances under which these will be used below:

**d. (NA) Which of the discretionary (optional) deductions and/or exclusions policies does the PHA plan to employ (select all that apply)**

- ☐ For the earned income of a previously unemployed household member
- ☐ For increases in earned income
- ☐ Fixed amount (other than general rent-setting policy)  
If yes, state amount/s and circumstances below:
- ☐ Fixed percentage (other than general rent-setting policy)  
If yes, state percentage/s and circumstances below:
- ☐ For household heads
- ☐ For other family members
- ☐ For transportation expenses
- ☐ For the non-reimbursed medical expenses of non-disabled or non-elderly families
- ☐ Other (describe below)

**e. (NA) Ceiling rents**

1. Do you have ceiling rents? (rents set at a level lower than 30% of adjusted income)

- ☐ Yes for all developments
- ☐ Yes but only for some developments
- ☐ No

2. **(NA)** For which kinds of developments are ceiling rents in place?

- ☐ For all developments
- ☐ For all general occupancy developments (not elderly or disabled or elderly)
- ☐ For specified general occupancy developments
- ☐ For certain parts of developments; e.g., the high-rise portion
- ☐ For certain size units; e.g., larger bedroom sizes
- ☐ Other (list below)

3.(NA) Select the space or spaces that best describe how you arrive at ceiling rent

- ☐ Market comparability study
- ☐ Fair market rents (FMR)
- ☐ 95<sup>th</sup> percentile rents
- ☐ 75 percent of operating costs
- ☐ 100 percent of operating costs for general occupancy (family) developments
- ☐ Operating costs plus debt service
- ☐ The "rental value" of the unit
- ☐ Other (list below)

f. (NA) Rent re-determinations:

1. (NA) Between income re-exams, how often must tenants report changes in income/ family composition/the changes result in an adjustment to rent?

- ☐ Never
- ☐ At family option
- ☐ Any time the family experiences an income increase
- ☐ Any time a family experiences an income increase above a threshold amount or percentage: (if selected, specify threshold) \_\_\_\_\_
- ☐ Other (list below)

g. ☐ Yes ☐ No: (NA) Does the PHA plan to implement individual savings accounts for residents (ISAs) as an alternative to the required 12 month disallowance of earned income and phasing in of rent increases in the next year?

## **(2) Flat Rents**

1. (NA) In setting the market-based flat rents, what sources of information did the PHA use to establish comparability? (select all that apply.)

- ☐ The section 8 rent reasonableness study of comparable housing
- ☐ Survey of rents listed in local newspaper
- ☐ Survey of similar unassisted units in the neighborhood
- ☐ Other (list/describe below)

## B. Section 8 Tenant-Based Assistance

Exemptions: PHAs that do not administer Section 8 tenant-based assistance are not required to complete sub-component 4B. Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program.

### (1) Payment Standards

Describe the voucher payment standards and policies.

a. What is the PHA's payment standard?

- ☐ At or above 90% but below 100% of FMR
- ☒ 100% of FMR
- ☒ Above 100% but at or below 110% of FMR
- ☐ Above 110% of FMR (if HUD approved; describe circumstances below)

b. If the payment standard is lower than FMR, why has the PHA selected this standard?

- ☐ FMRs are adequate to ensure success among assisted families in the PHA's segment of the FMR area
- ☐ The PHA has chosen to serve additional families by lowering the payment standard
- ☐ Reflects market or submarket
- ☐ Other (list below)

c. If the payment standard is higher than FMR, why has the PHA chosen this level?

- ☒ FMRs are not adequate to ensure success among assisted families in the PHA's segment of the FMR area
- ☒ Reflects market or submarket
- ☒ To increase housing options for families
- ☐ Other (list below)

d. How often are payment standards reevaluated for adequacy?

- ☒ Annually
- ☒ Other (list below)
  - Leasing success is monitored monthly by the number of vouchers that expire and become inactive.

e. What factors will the PHA consider in its assessment of the adequacy of its payment standard?

- ☒ Success rates of assisted families
- ☒ Rent burdens of assisted families
- ☒ Other (list below)

- Number of households leased in participating cities / localities.

### (2) Minimum Rent

a. What amount best reflects the PHA's minimum rent? (select one)

- ☐ \$0
- ☐ \$1-\$25

☒ \$26-\$50

- b. ☒ Yes ☐ No: Has the PHA adopted any discretionary minimum rent hardship exemption policies? (if yes, list below)
- All households receiving rental assistance must pay a minimum total tenant payment of rent of \$50.00. When a family is designated to pay a minimum rent, they are informed in writing. If the family believes that this amount would pose a hardship, they may request a review / hearing.

## **5. Operations and Management**

[24 CFR Part 903.7 9 (e)]

Exemptions from Component 5: High performing and small PHAs are not required to complete this section. Section 8 only PHAs must complete parts A, B, and C(2)

### **A. PHA Management Structure**

Describe the PHA's management structure and organization.

- ☒ An organization chart showing the PHA's management structure and organization is attached. **(Attachment B)**
- ☐ A brief description of the management structure and organization of the PHA follows:

### **B. HUD Programs Under PHA Management**

— List Federal programs administered by the PHA, number of families served at the beginning of the upcoming fiscal year, and expected turnover in each. (Use "NA" to indicate programs the PHA does not operate).

<b>Program Name</b>	<b>Units or Families Served at Year Beginning</b>	<b>Expected Turnover</b>
Public Housing	NA	
Section 8 Vouchers	9603	900
Section 8 Certificates	NA	
Section 8 Mod Rehab	NA	
Special Purpose Section 8 Certificates/Vouchers		
1) Disaster Voucher Program (DVP):	4	NA
2) Disaster Housing Assistance Program (DHAP):	5 (Administered as of 12/31/07)	NA
Public Housing Drug Elimination Program	NA	
Other Federal Programs		
Family Unification	175	Included in HV number.
Family Self Sufficiency	274	Included in HV number
Shelter Plus Care	348	

### C. Management and Maintenance Policies

List the PHA's public housing management and maintenance policy documents, manuals and handbooks that contain the Agency's rules, standards, and policies that govern maintenance and management of public housing, including a description of any measures necessary for the prevention or eradication of pest infestation (which includes cockroach infestation) and the policies governing Section 8 management.

- The Orange County Housing Authority does not administer public housing.

(1) (NA) Public Housing Maintenance and Management: (list below)

(2) Section 8 Management: (list below)

### 6. PHA Grievance Procedures

[24 CFR Part 903.7 9 (f)]

Exemptions from component 6: High performing PHAs are not required to complete component 6. Section 8-Only PHAs are exempt from sub-component 6A.

- The Orange County Housing Authority does not administer public housing.

#### A. Public Housing

1. ☐ Yes ☐ No: (NA) Has the PHA established any written grievance procedures in addition to federal requirements found at 24 CFR Part 966, Subpart B, for residents of public housing?

If yes, list additions to federal requirements below:

2. (NA) Which PHA office should residents or applicants to public housing contact to initiate the PHA grievance process? (select all that apply)

- ☐ PHA main administrative office  
☐ PHA development management offices  
☐ Other (list below)

#### B. Section 8 Tenant-Based Assistance

1. ☒ Yes ☐ No: Has the PHA established informal review procedures for applicants to the Section 8 tenant-based assistance program and informal hearing procedures for families assisted by the Section 8 tenant-based assistance program in addition to federal requirements found at 24 CFR 982? If yes, list additions to federal requirements below:

- a. Upon denial of assistance, applicants receive notification of OCHA policy and procedures for requesting an informal review.
- b. Program participants receive written instructions regarding OCHA policy and procedures for requesting an informal hearing at the time of their annual re-certification.

2. Which PHA office should applicants or assisted families contact to initiate the informal review and informal hearing processes?

- ☒ PHA main administrative office



☐ Other (list below)

## **7. Capital Improvement Needs**

[24 CFR Part 903.7 9 (g)]

Exemptions from Component 7: Section 8 only PHAs are not required to complete this component and may skip to Component 8.

- The Orange County Housing Authority does not administer public housing.

### **A. (NA) Capital Fund Activities**

Exemptions from sub-component 7A: PHAs that will not participate in the Capital Fund Program may skip to Component 7B. All other PHAs must complete 7A as instructed.

#### **(1) (NA) Capital Fund Program Annual Statement**

Using parts I, II, and III of the Annual Statement for the Capital Fund Program (CFP), identify capital activities the PHA is proposing for the upcoming year to ensure long-term physical and social viability of its public housing developments. complete this statement by using the CFP Annual Statement tables provided in the table library **OR**, at the PHA's option, by completing and attaching a properly updated HUD-52837.

Select one:

- ☐ The Capital Fund Program Annual Statement is provided as an attachment to the PHA Plan at Attachment (state name) OR
- ☐ The Capital Fund Program Annual Statement is provided below: (if selected, copy the CFP Annual Statement from the Table Library and insert here)

#### **(2) (NA) Optional 5-Year Action Plan**

Agencies are encouraged to include a 5-Year Action Plan covering capital work items. This statement can be completed by using the 5 Year Action Plan table provided in the table library at the end of the PHA Plan template **OR** by completing and attaching a properly updated HUD-52834.

a. ☐ Yes ☐ No: **(NA)** Is the PHA providing an optional 5-Year Action Plan for the Capital Fund?

b. **(NA)** If yes to question a, select one:

- ☐ The Capital Fund Program 5-Year Action Plan is provided as an attachment to the PHA Plan at Attachment (state name) OR
- ☐ The Capital Fund Program 5-Year Action Plan is provided below:

### **B. HOPE VI and Public Housing Development and Replacement Activities (Non-Capital Fund)**

Applicability of sub-component 7B: All PHAs administering public housing. Identify any approved HOPE VI and/or public housing development or replacement activities not described in the Capital Fund Program Annual Statement.

- The Orange County Housing Authority does not administer public housing.

- ☐ Yes ☐ No: a) **(NA)** Has the PHA received a HOPE VI revitalization grant? (if no, skip to question c; if yes, provide responses to question b for each grant, copying and completing as many times as necessary)
- b) **(NA)** Status of HOPE VI revitalization grant (complete one set of questions for each grant)
1. Development name:
  2. Development (project) number:

3. Status of grant: (select the statement that best describes the current status)

- ☐ Revitalization Plan under development  
☐ Revitalization Plan submitted, pending approval  
☐ Revitalization Plan approved  
☐ Activities pursuant to an approved Revitalization Plan underway

☐ Yes ☐ No: c) **(NA)** Does the PHA plan to apply for a HOPE VI Revitalization grant in the Plan year?

If yes, list development name/s below:

☐ Yes ☐ No: d) **(NA)** Will the PHA be engaging in any mixed-finance development activities for public housing in the Plan year?

If yes, list developments or activities below:

☐ Yes ☐ No: e) **(NA)** Will the PHA be conducting any other public housing development or replacement activities not discussed in the Capital Fund Program Annual Statement?

If yes, list developments or activities below:

## **8. Demolition and Disposition**

[24 CFR Part 903.7 9 (h)]

Applicability of component 8: Section 8 only PHAs are not required to complete this section.

- The Orange County Housing Authority does not administer public housing.

1. ☐ Yes ☐ No: **(NA)** Does the PHA plan to conduct any demolition or disposition activities (pursuant to section 18 of the U.S. Housing Act of 1937 (42 U.S.C. 1437p)) in the plan Fiscal Year? (If “No”, skip to component 9; if “yes”, complete one activity description for each development.)

### 2. Activity Description

☐ Yes ☐ No: **(NA)** Has the PHA provided the activities description information in the **optional** Public Housing Asset Management Table? (If “yes”, skip to component 9. If “No”, complete the Activity Description table below.)

<b>Demolition/Disposition Activity Description</b>
1a. Development name:
1b. Development (project) number:
2. Activity type: Demolition <input type="checkbox"/> Disposition <input type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date application approved, submitted, or planned for submission: (DD/MM/YY)

5. Number of units affected:
6. Coverage of action (select one)
<input type="checkbox"/> Part of the development
<input type="checkbox"/> Total development
7. Timeline for activity:
a. Actual or projected start date of activity:
b. Projected end date of activity:

**9. Designation of Public Housing for Occupancy by Elderly Families or Families with Disabilities or Elderly Families and Families with Disabilities** [24 CFR Part 903.7 9 (i)]

Exemptions from Component 9; Section 8 only PHAs are not required to complete this section.

- The Orange County Housing Authority does not administer public housing.

1. ☐ Yes ☐ No: **(NA)** Has the PHA designated or applied for approval to designate or does the PHA plan to apply to designate any public housing for occupancy only by the elderly families or only by families with disabilities, or by elderly families and families with disabilities or will apply for designation for occupancy by only elderly families or only families with disabilities, or by elderly families and families with disabilities as provided by section 7 of the U.S. Housing Act of 1937 (42 U.S.C. 1437e) in the upcoming fiscal year? (If “No”, skip to component 10. If “yes”, complete one activity description for each development, unless the PHA is eligible to complete a streamlined submission; PHAs completing streamlined submissions may skip to component 10.)

2. Activity Description

☐ Yes ☐ No: **(NA)** Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? If “yes”, skip to component 10. If “No”, complete the Activity Description table below.

Designation of Public Housing Activity Description
1a. Development name:
1b. Development (project) number:
2. Designation type:
Occupancy by only the elderly <input type="checkbox"/>
Occupancy by families with disabilities <input type="checkbox"/>
Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one)
Approved; included in the PHA’s Designation Plan <input type="checkbox"/>
Submitted, pending approval <input type="checkbox"/>
Planned application <input type="checkbox"/>

4. Date this designation approved, submitted, or planned for submission: (DD/MM/YY)
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected:
7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input type="checkbox"/> Total development

### **10. Conversion of Public Housing to Tenant-Based Assistance**

24 CFR Part 903.7 9 (j)] Exemptions from Component 10; Section 8 only PHAs are not required to complete this section.

- The Orange County Housing Authority does not administer public housing.

#### **A. Assessments of Reasonable Revitalization Pursuant to section 202 of the HUD FY 1996 HUD Appropriations Act**

1. ☐ Yes ☐ No: **(NA)** Have any of the PHA's developments or portions of developments been identified by HUD or the PHA as covered under section 202 of the HUD FY 1996 HUD Appropriations Act? (If "No", skip to component 11; if "yes", complete one activity description for each identified development, unless eligible to complete a streamlined submission. PHAs completing streamlined submissions may skip to component 11.)

#### **2. Activity Description**

- ☐ Yes ☐ No: **(NA)** Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? If "yes", skip to component 11. If "No", complete the Activity Description table below.

<b>Conversion of Public Housing Activity Description</b>
1a. Development name:
1b. Development (project) number:
2. What is the status of the required assessment? <input type="checkbox"/> Assessment underway <input type="checkbox"/> Assessment results submitted to HUD <input type="checkbox"/> Assessment results approved by HUD (if marked, proceed to next question) <input type="checkbox"/> Other (explain below)
3. <input type="checkbox"/> Yes <input type="checkbox"/> No: Is a Conversion Plan required?
4. Status of Conversion Plan (select the statement that best describes the current status)

<input type="checkbox"/> Conversion Plan in development <input type="checkbox"/> Conversion Plan submitted to HUD on: (DD/MM/YYYY) <input type="checkbox"/> Conversion Plan approved by HUD on: (DD/MM/YYYY) <input type="checkbox"/> Activities pursuant to HUD-approved Conversion Plan underway
5. Description of how requirements of Section 202 are being satisfied by means other than conversion (select one) <input type="checkbox"/> Units addressed in a pending or approved demolition application (date submitted or approved: _____) <input type="checkbox"/> Units addressed in a pending or approved HOPE VI demolition application (date submitted or approved: _____) <input type="checkbox"/> Units addressed in a pending or approved HOPE VI Revitalization Plan (date submitted or approved: _____) <input type="checkbox"/> Requirements no longer applicable: vacancy rates are less than 10 percent <input type="checkbox"/> Requirements no longer applicable: site now has less than 300 units <input type="checkbox"/> Other: (describe below)

<b>B. Reserved for Conversions pursuant to Section 22 of the U.S. Housing Act of 1937</b>
---

<b>C. Reserved for Conversions pursuant to Section 33 of the U.S. Housing Act of 1937</b>
---

## **11. Homeownership Programs Administered by the PHA**

[24 CFR Part 903.7 9 (k)]

- The Orange County Housing Authority does not administer public housing.

### **A. Public Housing**

Exemptions from Component 11A: Section 8 only PHAs are not required to complete 11A.

1. ☐ Yes ☐ No: **(NA)** Does the PHA administer any homeownership programs administered by the PHA under an approved section 5(h) homeownership program (42 U.S.C. 1437c(h)), or an approved HOPE I program (42 U.S.C. 1437aaa) or has the PHA applied or plan to apply to administer any homeownership programs under section 5(h), the HOPE I program, or section 32 of the U.S. Housing Act of 1937 (42 U.S.C. 1437z-4). (If “No”, skip to component 11B; if “yes”, complete one activity description for each applicable program/plan, unless eligible to complete a streamlined submission due to **small PHA** or **high performing**

**PHA** status. PHAs completing streamlined submissions may skip to component 11B.)

## 2. Activity Description

- ☐ Yes ☐ No: **(NA)** Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? (If “yes”, skip to component 12. If “No”, complete the Activity Description table below.)

Public Housing Homeownership Activity Description (Complete one for each development affected)	
1a. Development name:	
1b. Development (project) number:	
2. Federal Program authority:	
<input type="checkbox"/>	HOPE I
<input type="checkbox"/>	5(h)
<input type="checkbox"/>	Turnkey III
<input type="checkbox"/>	Section 32 of the USHA of 1937 (effective 10/1/99)
3. Application status: (select one)	
<input type="checkbox"/>	Approved; included in the PHA's Homeownership Plan/Program
<input type="checkbox"/>	Submitted, pending approval
<input type="checkbox"/>	Planned application
4. Date Homeownership Plan/Program approved, submitted, or planned for submission: (DD/MM/YYYY)	
5. Number of units affected:	
6. Coverage of action: (select one)	
<input type="checkbox"/>	Part of the development
<input type="checkbox"/>	Total development

## B. Section 8 Tenant Based Assistance

1. ☒ Yes ☐ No: Does the PHA plan to administer a Section 8 Homeownership program pursuant to Section 8(y) of the U.S.H.A. of 1937, as implemented by 24 CFR part 982 ? (If “No”, skip to component 12; if “yes”, describe each program using the table below (copy and complete questions for each program identified), unless the PHA is eligible to complete a streamlined submission due to high

performer status. **High performing PHAs** may skip to component 12.)

2. Program Description:

- OCHA's Administrative Plan continues to include a pilot Section 8 Housing Choice Voucher (HCV) Homeownership Program, which targets active participants in the Section 8 HCV Program. Language in the current Administrative Plan states OCHA's intention to implement such a program if certain conditions are met. Such conditions include obtaining technical assistance from a nonprofit or other partner organization(s) that will provide homeownership counseling, lender coordination or other required program components. To date, OCHA has not entered into an agreement with such an organization. However, OCHA has been in discussions with Neighborhood Housing Services of Orange County and other community-based organizations. OCHA has also met with other Housing Authorities in the Southern California region, such as neighboring San Bernardino County and the City of Anaheim in Orange County, that have implemented or are in the process of implementing a HCV Homeownership program.

a. Size of Program

☒ Yes ☐ No: Will the PHA limit the number of families participating in the section 8 homeownership option?

If the answer to the question above was yes, which statement best describes the number of participants? (select one)

- ☒ 25 or fewer participants  
☐ 26 - 50 participants  
☐ 51 to 100 participants  
☐ more than 100 participants

b. PHA-established eligibility criteria

☒ Yes ☐ No: Will the PHA's program have eligibility criteria for participation in its Section 8 Homeownership Option program in addition to HUD criteria? If yes, list criteria below:

- A pilot program will only be initiated if OCHA has a partner organization to provide technical support and required homeownership counseling.

## **12. PHA Community Service and Self-sufficiency Programs**

[24 CFR Part 903.7 9 (l)] Exemptions from Component 12: High performing and small PHAs are not required to complete this component. Section 8-Only PHAs are not required to complete sub-component C.

### **A. PHA Coordination with the Welfare (TANF) Agency**

#### 1. Cooperative agreements:

- ☒ Yes ☐ No: Has the PHA has entered into a cooperative agreement with the TANF Agency, to share information and/or target supportive services (as contemplated by section 12(d)(7) of the Housing Act of 1937)? If yes, what was the date that agreement was signed? DD/MM/YY

- a. Family Unification: 21/08/00  
b. Information Sharing: 04/02/00

#### 2. Other coordination efforts between the PHA and TANF agency

- ☒ Client referrals  
☒ Information sharing regarding mutual clients (for rent determinations and otherwise)  
☒ Coordinate the provision of specific social and self-sufficiency services and programs to eligible families  
☐ Jointly administer programs  
☐ Partner to administer a HUD Welfare-to-Work voucher program  
☐ Joint administration of other demonstration program  
☐ Other (describe)

1. The Orange County District Attorneys office conducts tenant fraud investigations for cases referred by OCHA staff. In addition, the DA provides OCHA with a list of Welfare Fraud convictions the Department of Social Services, which OCHA shares with the other three Housing Authorities within Orange County.

### **B. Services and programs offered to residents and participants**

#### **(1) General**

##### a. Self-Sufficiency Policies

Which of the following discretionary policies will the PHA employ to enhance the economic and social self-sufficiency of assisted families?

- ☐ Public housing rent determination policies  
☐ Public housing admissions policies  
☒ Section 8 admissions policies



- ☐ Preference in admission to section 8 for certain public housing families  
☒ Preferences for families working or engaging in training or education programs for non-housing programs operated or coordinated by the PHA  
☐ Preference/eligibility for public housing homeownership option participation  
☐ Preference/eligibility for section 8 homeownership option participation  
☐ Other policies (list below)

b. Economic and Social self-sufficiency programs

- ☒ Yes ☐ No: Does the PHA coordinate, promote or provide any programs to enhance the economic and social self-sufficiency of residents? (If "yes", complete the following table; if "no" skip to sub-component 2, Family Self Sufficiency Programs. The position of the table may be altered to facilitate its use. )

Services and Programs				
Program Name & Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/specific criteria/other)	Access (development office / PHA main office / other provider name)	Eligibility (public housing or section 8 participants or both)
FSS Enhancement Program	274	Voluntary	OCHA main office	HCV participant
Information current as of December 31, 2007.				

**(2) Family Self Sufficiency program/s**

a. Participation Description

Family Self Sufficiency (FSS) Participation		
Program	Required Number of Participants (start of FY 2007 Estimate)	Actual Number of Participants (As of: DD/MM/YY)
Public Housing	Not Applicable	Not Applicable
Section 8 FSS Program	274	31 / 12 / 07

- b. ☒ Yes ☐ No: If the PHA is not maintaining the minimum program size required by HUD, does the most recent FSS Action Plan address the steps the PHA plans to take to achieve at least the minimum program size? If no, list steps the PHA will take below:

**C. Welfare Benefit Reductions:**

1. (NA) The PHA is complying with the statutory requirements of section 12(d) of the U.S. Housing Act of 1937 (relating to the treatment of income changes resulting from welfare program requirements) by: (select all that apply)

- ☐ Adopting appropriate changes to the PHA's public housing rent determination policies and train staff to carry out those policies
- ☐ Informing residents of new policy on admission and reexamination
- ☐ Actively notifying residents of new policy at times in addition to admission and reexamination.
- ☐ Establishing or pursuing a cooperative agreement with all appropriate TANF agencies regarding the exchange of information and coordination of services
- ☐ Establishing a protocol for exchange of information with all appropriate TANF agencies
- ☐ Other: (list below)

**D. Reserved for Community Service Requirement pursuant to section 12(c) of the U.S. Housing Act of 1937**

### **13. PHA Safety and Crime Prevention Measures**

[24 CFR Part 903.7 9 (m)] Exemptions from Component 13: High performing and small PHAs not participating in PHDEP and Section 8 Only PHAs may skip to component 15. High Performing and small PHAs that are participating in PHDEP and are submitting a PHDEP Plan with this PHA Plan may skip to sub-component D.

#### **A. Need for measures to ensure the safety of public housing residents**

- The Orange County Housing Authority does not administer public housing.

1. **(NA)** Describe the need for measures to ensure the safety of public housing residents
  - ☐ High incidence of violent and/or drug-related crime in some or all of the PHA's developments.
  - ☐ High incidence of violent and/or drug-related crime in the areas surrounding or adjacent to the PHA's developments
  - ☐ Residents fearful for their safety and/or the safety of their children
  - ☐ Observed lower-level crime, vandalism and/or graffiti
  - ☐ People on waiting list unwilling to move into one or more developments due to perceived and/or actual levels of violent and/or drug-related crime
  - ☐ Other (describe below)
  
2. **(NA)** What information or data did the PHA used to determine the need for PHA actions to improve safety of residents
  - ☐ Safety and security survey of residents
  - ☐ Analysis of crime statistics over time for crimes committed "in and around" public housing authority
  - ☐ Analysis of cost trends over time for repair of vandalism and removal of graffiti
  - ☐ Resident reports
  - ☐ PHA employee reports
  - ☐ Police reports
  - ☐ Demonstrable, quantifiable success with previous or ongoing anticrime/anti drug programs.
  - ☐ Other (describe below)

3. (NA) Which developments are most affected?

**B. (NA) Crime and Drug Prevention activities the PHA has undertaken or plans to undertake in the next PHA fiscal year**

1. (NA) List the crime prevention activities the PHA has undertaken or plans to undertake:

- ☐ Contracting with outside and/or resident organizations for the provision of crime- and/or drug-prevention activities
- ☐ Crime Prevention Through Environmental Design
- ☐ Activities targeted to at-risk youth, adults, or seniors
- ☐ Volunteer Resident Patrol/Block Watchers Program
- ☐ Other (describe below)

2. (NA) Which developments are most affected?

**C. (NA) Coordination between PHA and the police**

1. (NA) Describe the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities: (select all that apply)

- ☐ Police involvement in development, implementation, and/or ongoing evaluation of drug-elimination plan
- ☐ Police provide crime data to housing authority staff for analysis and action
- ☐ Police have established a physical presence on housing authority property (e.g., community policing office, officer in residence)
- ☐ Police regularly testify in and otherwise support eviction cases
- ☐ Police regularly meet with the PHA management and residents
- ☐ Agreement between PHA and local law enforcement agency for provision of above-baseline law enforcement services.
- ☐ Other activities (list below)

2. (NA) Which developments are most affected?

**D. (NA) Additional information as required by PHDEP/PHDEP Plan**

PHAs eligible for FY 2005 PHDEP funds must provide a PHDEP Plan meeting specified requirements

- ☐ Yes ☐ No: Is the PHA eligible to participate in the PHDEP in the fiscal year covered by this PHA Plan?
- ☐ Yes ☐ No: Has the PHA included the PHDEP Plan for FY 2005 in this PHA Plan?
- ☐ Yes ☐ No: This PHDEP Plan is an Attachment. (Attachment Filename: \_\_\_\_)

#### **14. Pets (inactive for January 1 PHAs)**

[24 CFR Part 903.7 9 (n)]

#### **15. Civil Rights Certifications**

[24 CFR Part 903.7 9 (o)]

Civil rights certifications are included in the PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations.

#### **16. Fiscal Audit**

[24 CFR Part 903.7 9 (p)]

1. ☒ Yes ☐ No: Is the PHA required to have an audit conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h))?  
(If no, skip to component 17.)
2. ☒ Yes ☐ No: Was the most recent fiscal audit submitted to HUD?
3. ☐ Yes ☒ No: Were there any findings as the result of that audit?
4. ☐ Yes ☐ No: **(NA)** If there were any findings, do any remain unresolved?  
If yes, how many unresolved findings remain? \_\_\_\_\_
5. ☐ Yes ☐ No: **(NA)** Have responses to any unresolved findings been submitted to HUD?  
If not, when are they due (state below)?

#### **17. PHA Asset Management**

[24 CFR Part 903.7 9 (q)] Exemptions from component 17: Section 8 Only PHAs are not required to complete this component. High performing and small PHAs are not required to complete this component.

- The Orange County Housing Authority does not administer public housing.

1. ☐ Yes ☐ No: **(NA)** Is the PHA engaging in any activities that will contribute to the long-term asset management of its public housing stock, including how the Agency will plan for long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs that have **not** been addressed elsewhere in this PHA Plan?
2. **(NA)** What types of asset management activities will the PHA undertake?
  - ☐ Not applicable
  - ☐ Private management
  - ☐ Development-based accounting
  - ☐ Comprehensive stock assessment
  - ☐ Other: (list below)
3. ☐ Yes ☐ No: **(NA)** Has the PHA included descriptions of asset management activities in the **optional** Public Housing Asset Management Table?

## **18. Other Information**

[24 CFR Part 903.7 9 (r)]

### **A. Resident Advisory Board Recommendations**

1. ☒ Yes ☐ No: Did the PHA receive any comments on the PHA Plan from the Resident Advisory Board/s?

2. If yes, the comments are: (if comments were received, the PHA **MUST** select one)

☒ Attached at Attachment: (E) Resident Advisory Board Comments  
(F) Public Comments Received

☐ Provided below:

3. In what manner did the PHA address those comments?

☐ Considered comments, but determined that no changes to the PHA Plan were necessary.

☐ The PHA changed portions of the PHA Plan in response to comments  
List changes below:

☒ Other: (list below)

- Five members of the Resident Advisory Board formed an *ad-hoc committee* and met on February 14, 2008 to discuss the homeownership program, as documented in Attachment E. On February 28, 2008 the Resident Advisory Board/H&CD Commission voted to approve the homeownership program, as described in the Annual PHA Plan, and directed that staff initiate a review of the selection process and other potential enhancements of the homeowner program during the update of OCHA's Administrative Plan, which is scheduled to begin within the next 10 months. (**Attachment: E RAB Comments**)
- The Legal Aid Society of Orange County and the National Housing Law Project submitted joint comments regarding the PHA Plan at the Public Hearing conducted by the H&CD Commission/Resident Advisory Board on February 28, 2008. These comments are included in Attachment F. OCHA Staff was directed to review and consider the comments, which pertain primarily to policy and operational issues relative to OCHA's Administrative Plan, along with recommendations. The Legal Aid Society of Orange County and the National Housing Law Project will be consulted regarding the comments in Attachment F and representatives from these organizations will be invited to participate in discussions and meetings with Commission members and staff during the updating of OCHA's Administrative Plan. (**Attachment: F Public Comments Received**)

### **B. Description of Election process for Residents on the PHA Board**

1. ☐ Yes ☒ No: Does the PHA meet the exemption criteria provided section 2(b)(2) of the U.S. Housing Act of 1937? (If no, continue to question 2; if yes, skip to sub-component C.)

2. ☐ Yes ☒ No: Was the resident who serves on the PHA Board elected by the residents? (If yes, continue to question 3; if no, skip to sub-component C.)
3. Description of Resident Election Process
- a. Nomination of candidates for place on the ballot: (select all that apply)
- ☐ Candidates were nominated by resident and assisted family organizations
- ☐ Candidates could be nominated by any adult recipient of PHA assistance
- ☐ Self-nomination: Candidates registered with the PHA and requested a place on ballot
- ☒ Other: (describe)
- Volunteer candidates were reviewed and appointed by locally elected officials.
- b. Eligible candidates: (select one)
- ☐ Any recipient of PHA assistance
- ☐ Any head of household receiving PHA assistance
- ☒ Any adult recipient of PHA assistance
- ☐ Any adult member of a resident or assisted family organization
- ☐ Other (list)
- c. Eligible voters: (select all that apply)
- ☐ All adult recipients of PHA assistance (public housing & section 8 assistance)
- ☐ Representatives of all PHA resident and assisted family organizations
- ☒ Other (list)
- Volunteer candidates were reviewed and appointed by locally elected officials.

### **C. Statement of Consistency with the Consolidated Plan**

For each applicable Consolidated Plan, make the following statement (copy questions as many times as necessary).

#### **1. Consolidated Plan jurisdiction:**

Orange County Urban County Program (includes all unincorporated areas and the following cities: Aliso Viejo, Brea, Cypress, Dana Point, Laguna Beach, Laguna Hills, Laguna Woods, La Palma, Los Alamitos, Rancho Santa Margarita, San Clemente, San Juan Capistrano, Seal Beach, Stanton, Villa Park, and Yorba Linda.

2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)
- ☒ The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- ☒ The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- ☒ The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
- ☒ Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
- ☐ Other: (list below)

4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)

1. Consolidated Plan jurisdiction: **City of Buena Park.**

2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)

- ☒ The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- ☒ The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- ☒ The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
- ☒ Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
- ☐ Other: (list below)

4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)

1. Consolidated Plan jurisdiction: **City of Costa Mesa.**

2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)

- ☒ The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- ☒ The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- ☒ The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
- ☒ Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
- ☐ Other: (list below)

4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)

1. Consolidated Plan jurisdiction: **City of Fountain Valley.**

2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)

- ☒ The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- ☒ The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- ☒ The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.

- ☒ Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
- ☐ Other: (list below)

4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)

1. Consolidated Plan jurisdiction: **City of Fullerton.**

2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)

- ☒ The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- ☒ The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- ☒ The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
- ☒ Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
- ☐ Other: (list below)

4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)

1. Consolidated Plan jurisdiction: **City of Huntington Beach.**

2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)

- ☒ The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- ☒ The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- ☒ The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
- ☒ Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
- ☐ Other: (list below)

4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)

1. Consolidated Plan jurisdiction: **City of Irvine.**

2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)

- ☒ The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- ☒ The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.



- ☒ The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
- ☒ Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
- ☐ Other: (list below)
4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)
1. Consolidated Plan jurisdiction: **City of La Habra.**
2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)
- ☒ The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- ☒ The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- ☒ The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
- ☒ Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
- ☐ Other: (list below)
4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)
1. Consolidated Plan jurisdiction: **City of Laguna Niguel.**
2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)
- ☒ The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- ☒ The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- ☒ The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
- ☒ Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
- ☐ Other: (list below)
4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)
1. Consolidated Plan jurisdiction: **City of Lake Forest.**
2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)
- ☒ The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- ☒ The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.

- ☒ The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
- ☒ Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
- ☐ Other: (list below)
4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)
1. Consolidated Plan jurisdiction: **City of Mission Viejo.**
2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)
- ☒ The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- ☒ The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- ☒ The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
- ☒ Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
- ☐ Other: (list below)
4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)
1. Consolidated Plan jurisdiction: **City of Newport Beach.**
2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)
- ☒ The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- ☒ The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- ☒ The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
- ☒ Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
- ☐ Other: (list below)
4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)
1. Consolidated Plan jurisdiction: **City of Orange.**
2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)
- ☒ The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- ☒ The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.

- ☒ The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
- ☒ Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
- ☐ Other: (list below)

4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)

1. Consolidated Plan jurisdiction: **City of San Juan Capistrano.**

2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)

- ☒ The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- ☒ The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- ☒ The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
- ☒ Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
- ☐ Other: (list below)

4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)

1. Consolidated Plan jurisdiction: **City of Tustin.**

2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)

- ☒ The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- ☒ The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- ☒ The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
- ☒ Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
- ☐ Other: (list below)

4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)

1. Consolidated Plan jurisdiction: **City of Westminster.**

#### **D. Other Information Required by HUD**

Use this section to provide any additional information requested by HUD.

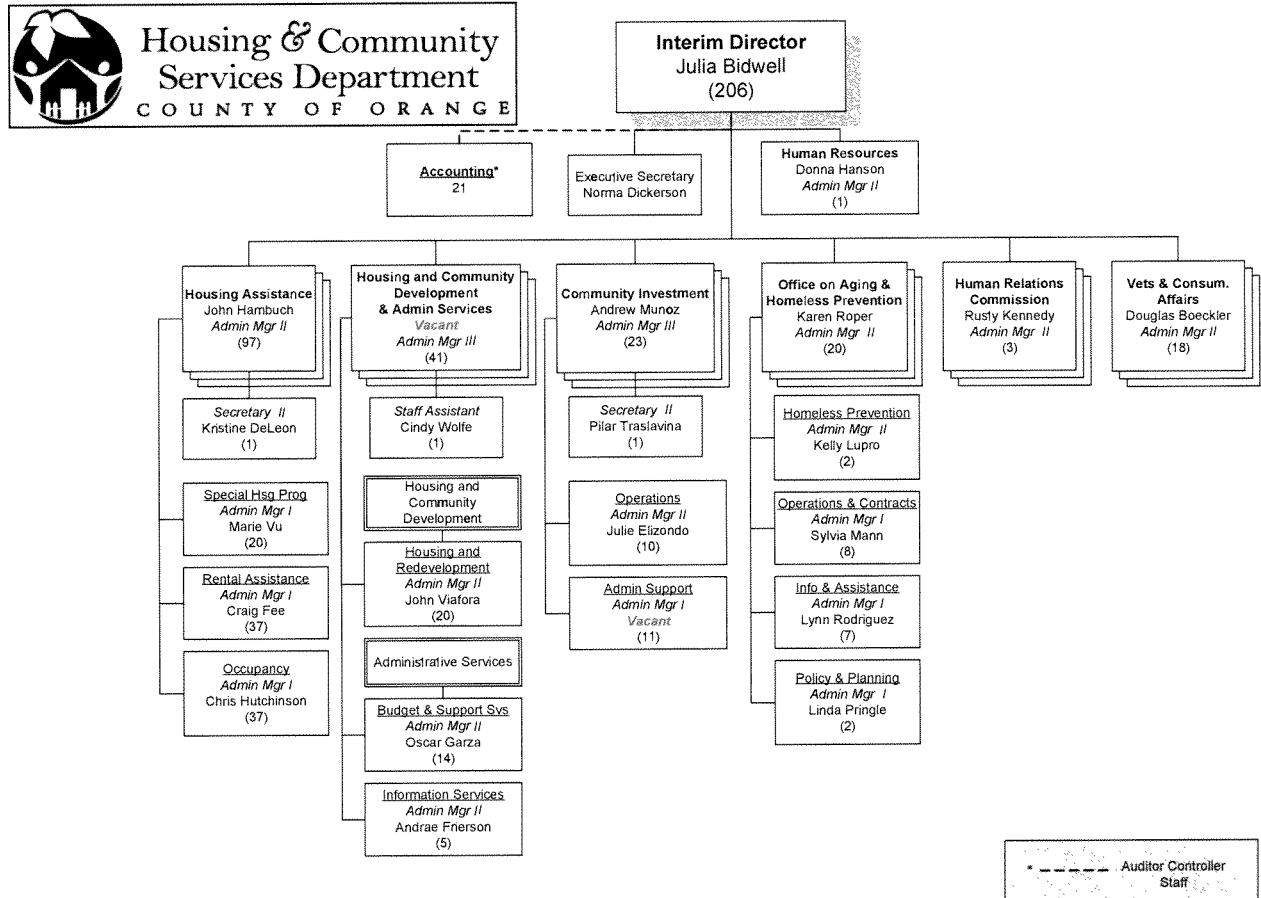


Housing & Community  
Services Department  
C O U N T Y O F O R A N G E

**RESIDENT ADVISORY BOARD**  
H&CD Commission Roster 2007 - 2008

OFFICER ELECTION	COMMISSION MEMBER		APPOINTED BY	DATE	
	LAST	FIRST		ORIGINAL	ENDING
	RICE	MARGIE L.	BOARD OFFICE 1st DISTRICT	07/24/2001	06/30/2007
	WAHNER	JAMES A.	BOARD OFFICE 2nd DISTRICT	02/23/1999	06/30/2007
Chair: 7/2006	PALMER	JIM	BOARD OFFICE 3rd DISTRICT	05/11/1999	06/30/2007
	BEARD	PETER	BOARD OFFICE 4th DISTRICT	10/07/2003	06/30/2007
	SONNENBERG	BRUCE A.	BOARD OFFICE 5th DISTRICT	08/21/2001	06/30/2007
	GARCIA	RON	LEAGUE OF CALIFORNIA CITIES	02/28/2008	06/30/2008
	McCULLOUGH	KATHRYN	LEAGUE OF CALIFORNIA CITIES	07/01/2006	06/30/2008
	MERRIAM	PARIS	H&CD Comm. HCV TENANT	07/01/2004	06/30/2008
	BARKER	MICHAEL	H&CD Comm. HCV TENANT (62+)	07/01/2006	06/30/2008
	LARSON	SCOTT C.	H&CD Comm. Member-At-Large	02/23/1999	06/30/2008
Vice Chair: 7/06	RIGHEIMER	JIM	H&CD Comm. Member-At-Large	05/11/1999	06/30/2008

# Housing & Community Services Department Organizational Chart 2008



## **Statement of Accomplishments Toward the Goals & Objectives of OCHA's 2005-2009 Five-Year Plan:**

In Section B of said Plan, OCHA identified a number of HUD strategic goals and objectives in support of its mission. Since fiscal year 2005, OCHA achieved significant accomplishments towards the goals and objectives outlined in the Plan:

### **HUD Strategic Goal: Increase the availability of decent, safe and affordable housing.**

#### **PHA Goal: Expand the supply of assisted housing**

##### **Objectives**

1. Apply for additional rental vouchers
  - a. OCHA will apply for additional rental vouchers when HUD funding becomes available.

#### **PHA Goal: Improve the quality of assisted housing**

##### **Objectives:**

1. Improve voucher management (SEMAP score)
  - a. Achieved SEMAP rating as a High Performing PHA for the fifth successive year, scoring 103% out of a possible 110% on SEMAP scoring.
2. Increase customer satisfaction
  - a. Expanded landlord direct deposit. Currently 30% of OCHA participating landlords receive their HAP checks through direct deposit.
  - b. Expanded implementation of "Owner Hotline" with dedicated staff responding to owner inquiries and marketing the HCVP that has resulted in an increased number of owner referral listing of available rental housing. Referral Lists are updated weekly and distributed during briefings to eligible participating families and are available at the reception counter.
  - c. Owner Newsletter published bi-annually.
  - d. Tenant Newsletter published bi-annually.

#### **PHA Goal: Increase assisted housing choices**

##### **Objectives:**

1. Provide program information regarding housing opportunities outside OCHA jurisdiction under the provisions of portability and mobility.
2. Worked in collaboration with neighboring PHAs in the development of mobility MOU to streamline processing of tenant moves between PHA jurisdictions. .
3. Conduct outreach efforts to potential voucher landlords
  - a. Leasing activities conducted by field staff included providing potential landlords information about the benefits and safeguards owners receive when making their rental housing available to eligible families.

#### **PHA Goal: Promote self-sufficiency and asset development of assisted households.**

##### **Objectives:**

1. Network with variety of outside supportive service providers to insure FSS participants have access to the resources needed in order to reach their goals and improve participants' employability through the FSS Enhancement program
  - a. Expanded FSS case management services by applying for and receiving additional funds through annual SuperNOFA applications.
  - b. Develop additional supportive service resources to assist the elderly and families with disabilities to maintain independent living.

- c. Utilized tenant newsletters and other methods of referral of applicants to the variety of resources available through the “Info Link 211 OC” hotline.

**HUD Strategic Goal: Ensure Equal Opportunity in Housing for all Americans**

**PHA Goal: Ensure equal opportunity and affirmatively further fair housing**

**Objectives:**

1. Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability: In conjunction with the Orange County Fair Housing Council
  - a. Coordinated with the Fair Housing Council or with HUD, to provide staff with updated training materials.
2. Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, or disability.
  - a. Implemented the Owner Hotline to market the HCVP to landlords and thereby expand OCHA’s referral list of available rental housing choices to assist families in locating eligible housing.
  - b. Collaborated with three local PHAs to enhance outreach activities to owners and to coordinate Mobility opportunities for participating households.
  - c. Maintained outreach activities to owners and to local apartment associations throughout all communities, that included the distribution of an owner newsletter and other printed material.



**Public Housing Agency Plan Provision – FY 2008 Annual Plan  
Orange County Housing Authority (OCHA)**

**OCHA Policy: Domestic Violence, Dating Violence, Sexual Assault, and Stalking**

In compliance with the provisions of the Violence Against Women and Department of Justice Reauthorization Act of 2005 (Pub. L. 109-162) (VAWA), the Orange County Housing Authority (OCHA) has included as an attachment in the FY 2008 PHA Annual Plan, a statement describing the following actions OCHA will take to support or assist victims of domestic violence, dating violence and stalking:

**1. The following activities, services, or programs are provided by OCHA, either directly or in partnership with other service providers, to child and adult victims of domestic violence, dating violence, sexual assault or stalking:**

OCHA works in collaboration with a number of Orange County agencies that have access to a variety of programs and support services that offer: counseling (individual, group and family), parenting education, after school recreation and enrichment programs, referral services, domestic violence and anger management education, gang prevention, in-home visitation and parent support programs, and health services referrals. Referral and supportive service providers include:

**Information and Referral**

2-1-1 Orange County: a 24/7 calling service that links OC residents to community health and human services & support.

**Legal Resources**

Legal Aid Society of Orange County  
Fair Housing Council of Orange County

**Supportive Services**

Orange County Health Care Agency and network of service providers

**2. The following activities, services, or programs are provided by OCHA, either directly or in partnership with other service providers, to child and adult victims of domestic violence, dating violence, sexual assault or stalking to obtain or maintain housing:**

Victims who have become displaced or are in jeopardy of being displaced from their assisted unit due to domestic violence will be referred to human resource centers, the County's Social Services Agency and/or Health Care Agency or other organizations which provides referrals to shelters, emergency, transitional and permanent housing options for battered women and children. Orange County domestic violence assistance programs have hotlines that provide housing, counseling and other services and interface with shelters, including:

Home on the Green Pastures  
Laura's House  
Community Services Programs  
Anaheim Family Justice Center

Human Options  
Women's Transitional Living Center  
Information on Protective/Restraint Orders  
Interval House

**3. The following activities, services, or programs are provided by OCHA, either directly or in partnership with other service providers, to help prevent domestic violence, dating violence, sexual assault or stalking, or to enhance victim safety in assisted families.**

*OCHA staff interacts with assisted households during an annual or interim recertification, during the initial eligibility process and during inspection of their housing unit. If staff becomes aware or suspect that domestic violence is occurring in the home, the tenant will be advised of their rights under VAWA. Victim(s) will be referred to the agencies listed below or comparable organizations, which offer intervention and prevention counseling programs, domestic violence and anger management education and other supportive services that focus on family unity. OCHA will also notify all participating tenants and landlords of their rights and responsibilities under VAWA through information published in OCHA's tenant and landlord newsletters.*

**Prevention and Intervention**

- Orange County Network of Care: Behavioral Health
- Community Services Program, Inc
- Human Options
- Center for Creative Alternatives

### **Resident Advisory Board (RAB) Comments:**

On December 5, 2007, the H&CD Commission members designated themselves as the **Resident Advisory Board (RAB)** for the Orange County Housing Authority (OCHA). The H&CD Commission meeting held on January 24, 2008 commenced the forty-five day public review period for OCHA's Annual PHA Plan for fiscal year 2008.

During this meeting, several RAB members entered into a discussion regarding the "homebuyer option" allowed in the Housing Choice Voucher Program. Language in OCHA's Administrative Plan conditionally allows for a homeownership pilot program that will only be available if OCHA is successful in obtaining technical assistance from a nonprofit or other partner organization(s) that provides counseling, lender coordination or other required program components.

There was considerable interest in exploring whether this language should be modified to increase OCHA's commitment to homeownership and delete the status as a "pilot program". In order to explore the impact of making such a change, a recommendation was made to discuss the matter with members of the **Project Advisory Committee (PAC)** at their February 14, 2008 meeting.

Although the PAC does not have jurisdiction to vote on this matter, its members have extensive experience with affordable housing projects and financing that would be valuable in offering technical guidance for this discussion. Two OCHA tenant RAB members, a representative from the Affordable Housing Clearinghouse and OCHA staff also joined PAC members.

Since membership in the PAC included other RAB members, those RAB committee members who attended the February 14, 2008 meeting were considered an *ad hoc committee*, as approved at the January 24, 2008 H&CD Commission meeting.

The discussion and conclusions resulted in a consensus to keep the homeownership pilot program as currently indicated in OCHA's Administrative Plan. However, it was suggested that program selection processes be reviewed and modification be considered over the coming year.

**Public Comments Received:**

Public Hearing held on February 28, 2008.



# LEGAL AID SOCIETY OF ORANGE COUNTY

2101 North Tustin Avenue, Santa Ana, California 92705  
(714) 571-5200 • FAX (714) 571-5270

February 27, 2008

Jacqui Voss  
Orange County Housing Authority  
1770 N Broadway  
Santa Ana, CA 92706

Dear Ms. Voss,

The Legal Aid Society of Orange County and the National Housing Law Project submit the following comments in connection with the Orange County Housing Authority's proposed Annual Plan for Fiscal Year 2008.

The Legal Aid Society provides free civil legal services to low-income persons and seniors who live in Orange County. The National Housing Law Project is a national housing law and advocacy center that provides legal assistance, advocacy advice and housing expertise to legal services and other attorneys, low-income housing advocacy groups, and others who serve the poor. We submit these comments in the hope that they will facilitate a continued dialogue with the Orange County Housing Authority (OCHA) and assist the agency in administering its housing programs.

## **GENERALLY**

### Resident Advisory Board

Page 52, Annual Plan, Attachment A: The list of Resident Advisory Board (RAB) members appears to actually be the board of commissioners for the housing authority. A RAB is required by 24 C.F.R. Section 903.13. OCHA should send notices to all residents soliciting applications for membership on the RAB. We are aware of tenants who are interested in serving on the RAB and will be pleased to provide their names to you.

Administrative Plan

4.2I Eligibility for Admission, Family Composition, Live-in Aides (page 15)

“2. This live-in attendant must also submit required identification (e.g. Driver License/state issued identification card, Social Security card, birth certificate, alien registration card); and must be a legal resident in the U.S.A.”

COMMENT:

Requiring a live-in aide to provide proof of legal residency/citizenship is inappropriate. First, live-in aides are not part of the family. OCHA has no obligation to a live-in aide, nor does the aide have any right to remain if the family member s/he cares for leaves. Thus, there is no basis for OCHA to require proof of legal residency for a live-in aide. HUD currently only has authority to collect social security numbers for the purpose of determining eligibility for assistance. 42 U.S.C. §3543(a). In addition, even family members can certify that they do not seek to verify eligible immigrant status. 24 C.F.R. 5.508(e). As long as the family has at least one member certify to citizenship/eligible immigrant status, they can still receive assistance. In light of this, requiring that a live-in aide provide documentation is unreasonable. Moreover, this policy could lead to a situation where disabled persons have trouble finding affordable live-in aides who can provide documentation of legal residency. In such a situation, OCHA would be in violation of federal fair housing laws. 42 U.S.C. §3601 et. seq.; 24 C.F.R. §5.524.

**VOUCHER PROGRAM**

Number of Authorized Vouchers

Pages 1 and 3, Annual Plan: The Annual Plan states that OCHA has 9619 vouchers and that during 2007 an average of 9603 households were receiving assistance each month. That translates into an impressive utilization rate of 99.8%. We are pleased that OCHA was able to achieve that utilization rate especially because the average usage increased from 9,350 in 2006 to 9603 in 2007.

Payment Standard

Pages 6 and 30, Annual Plan: The Annual Plan states that the payment standard is both 100% of the Fair Market Rent (FMR) and 100-100% of the FMR. OCHA also notes the “escalating rents in Orange County” and that it received over 5,400 requests for rent increases in 2007.

COMMENT:

As a result of the escalating rents, has OCHA increased its payment standard? Is the payment standard for all units now set at 110% of fair market rent? Has OCHA determined if the increase

Jacqui Voss  
February 27, 2008  
Page Three

in rents has limited tenant mobility? If tenant mobility has been impacted, has OCHA requested permission to increase the payment standard in certain rental markets in the county so as to permit continuing mobility or to expand it? It is entirely possible for OCHA to increase the

payment standard in 2008 and pay for that increase from the OCHA reserves. It is our understanding that OCHA has a substantial amount of reserves (unobligated fund balance), more than \$ 6 million, which may not be used for any other purpose than to make housing assistance payments.

#### Voucher Expirations

Page 7, Annual Plan: The Annual Plan provides information regarding the 883 families that are no longer participating in the program with OCHA. One of the reasons for the end of participation includes 18% (158 families) for "voucher expiration." The same percentage of families lost their vouchers in 2006 for the same reason.

#### COMMENT:

We are concerned about this group of families who have lost their vouchers. An expiration of the voucher means that the family may have lost the voucher for no fault of the family. What are the characteristics of this group of families? Are they disproportionately the poorest families, those with mental or physical disabilities? Has OCHA determined if these are families who are forced to move, have difficulty finding another unit because of the increasing rents, poor credit, tenant history or lack of move-in funds for the security deposit and first and last month's rent? Please let us know what OCHA has done to analyze the problem. If there has been no analysis, we urge you to conduct one with the information that is available. If we can be of assistance in designing a response that meets the needs of these families, please let us know.

#### Procedural Violations

Page 6 of the Annual Plan states that 16% (141 families) have lost their vouchers because of procedural violations. In reviewing the Annual Plan for 2007, it appears that in 2006 approximately the same percentage of families may have lost their vouchers due to program violations. (In 2006 there was one category for program violations which totaled 31% and no category for program fraud, in the 2007 the percentage is 11% for program fraud and 16% for program violations for a total of 27%).

#### COMMENT:

Again, this is a high percentage, and we would like to know what OCHA is doing to reduce it. What kinds of procedural violations are most prevalent? Are the procedural violations ones that need better explanations so that participants may avoid the pitfalls? What are the characteristics

of families with such violations – are they the elderly and disabled families, working families, etc.? Please let us know how OCHA has analyzed the problem. Are there steps that could be taken to reduce the number of families who encounter procedural violations? Again, we would be glad to assist you in seeking solutions to reduce this number.

#### Initial Lease-up Success Rate

There is no information in the Annual Plan for 2008 regarding the lease-up rate in 2007.

#### COMMENT:

Please let us know what the lease-up rate was for 2007 and the reasons why families failed to lease-up. For 2006, OCHA stated that the lease-up rate was 80% and that one-half of those who did not lease up encountered problems such as “poor credit, tenant history, or lack of move-in funds.” What are the characteristics of the families who could not lease up in 2007? Are they primarily families of color, with children, elderly or disabled? Are they the poorest families? What programs can OCHA access that might address some of the financial barriers for these families? Again, feel free to contact us if this is a problem that we can help you to address more effectively

#### Implementation of the Violence Against Women Act (VAWA)

##### ANNUAL PLAN

##### Attachment D, OCHA Policy: Domestic Violence, Dating Violence, Sexual Assault, Stalking

We applaud OCHA’s efforts in establishing partnerships with other service providers in order to assist victims of domestic violence, dating violence, sexual assault, and stalking in obtaining or maintaining housing. We are also pleased that OCHA is advising tenants of their rights under VAWA during recertification.

#### COMMENT:

Attachment D states that during recertification, if staff members become aware of or suspect that domestic violence is occurring in the home, the tenant is advised of his or her VAWA rights. We encourage OCHA to provide information regarding VAWA rights in a manner that will not endanger victims who live with their batterers. For example, during recertification, it is preferable to meet with household members separately to explain VAWA’s protections. This prevents the victim from being intimidated by the batterer and enables the victim to ask questions regarding his or her VAWA rights.



Attachment D states that OCHA will continue to keep tenants informed of their rights under VAWA through information published in the Tenant/Landlord Newsletter. To prevent victims from having their assistance unnecessarily terminated based on the conduct of their abusers, we also encourage OCHA to include a paragraph explaining VAWA's protections in its termination notices. This approach has been suggested by HUD, which issued a notice stating that "PHAs could also include language discussing the VAWA protections in the termination/eviction notice and request that a tenant come into the office to pick up the [certification] form if the tenant believes the VAWA protections apply." See HUD Notice PIH 2006-42. Many batterers monitor the victim's access to the mail, and the victim may therefore be unaware of VAWA's protections if notice is sent through mailings only.

#### Annual Plan Page 24: Information Shared With Prospective Landlords

The Annual Plan states that OCHA will provide prospective owners with the name and telephone number of an applicant's last two landlords.

#### COMMENT:

A mandatory policy requiring tenants to disclose prior landlords' contact information or mandating that the information be shared if available may cause serious problems for victims of domestic violence. If the prospective owner contacts a victim's current or former landlord, the abuser may be able to track the victim's location. We suggest that OCHA tell applicants which parties will be contacted so that safety risks can be identified. We encourage OCHA to work with victims of domestic violence to identify alternative means of verification for critically needed information where primary means may place the applicant's safety at risk.

#### ADMINISTRATIVE PLAN

##### Split Households Prior to Housing Choice Voucher Issuance (page 16)

The Administrative Plan provides that if a household on the waiting list splits before the housing choice voucher is issued, OCHA may make a decision as to who will retain the waiting list position based on who is listed as head of household. There may be an exception granted in the case of domestic violence, if verification is provided.

#### COMMENT:

To assist program staff and participants in the event that a family on the waiting list breaks up due to domestic violence, we suggest that OCHA list the documents that it will consider in verifying incidents of domestic violence. Program participants often have questions regarding what documents can be used to prove the existence of domestic violence, dating violence, or stalking. For purposes of consistency, we encourage OCHA to use the certifying documents

listed in the Violence Against Women Act to verify domestic violence when a waiting list family breaks up. Under VAWA, an individual may certify that he or she is a victim of domestic violence, dating violence, or stalking by providing one of the following three documents: (1) HUD-approved certification form; (2) documentation signed by a victim service provider, an attorney, or a medical professional, from whom the victim has sought assistance in addressing domestic violence, dating violence, or stalking, in which the professional attests under penalty of perjury to the professional's belief that the incidents in question are bona fide incidents of abuse, and the victim of domestic violence, dating violence, or stalking has signed or attested to the documentation; or (3) a police or court record. *See* 42 U.S.C. § 1437f(ee)(A), (C).

#### Housing Choice Voucher Briefing (page 65)

The Administrative Plan currently lists several items that will be discussed during the briefing session for new Section 8 families.

#### COMMENT:

We recommend that the HUD form for certification of domestic violence be included in all packets distributed during the briefing session for new Section 8 participants, if the form is not already included in the packets. We also encourage OCHA to verbally inform participants, tenants, owners, and managers of their rights and obligations under VAWA through initial briefing sessions or other orientation meetings.

#### Housing Choice Voucher Issuance Determination for Split Households (page 105)

The Administrative Plan provides that when OCHA must decide who will retain the rental assistance when a voucher family breaks up, OCHA may assign assistance based on who is listed as head of household. There may be an exception in the event of domestic violence, if written verification is provided.

#### COMMENT:

We encourage OCHA to list the forms of documentation that will be accepted for verifying incidents of domestic violence when a voucher family breaks up. As noted above in our discussion of split households on the waiting list, OCHA should consider the forms of documentation listed in VAWA: HUD-approved certification form, signed statement from a service provider, police record, or court record.

#### Incorporating the Provisions of the Violence Against Women Act

Page 112 of OCHA's 2007 Administrative Plan states that OCHA will comply with VAWA when considering denial or termination of assistance. The 2007 Administrative Plan contains no other language implementing VAWA's provisions.

COMMENT:

While we are pleased that OCHA has included a policy statement that it will comply with VAWA, this statement alone is not sufficient to ensure that program staff will understand and properly utilize VAWA's provisions. OCHA should incorporate VAWA's requirements throughout the Administrative Plan so that they are readily accessible to staff members who handle admissions, portability requests, and terminations. It is unreasonable to expect that staff members will comply with VAWA if the statute's provisions are left out of the housing authority's major policy document for the Section 8 program. Including VAWA's provisions in the Administrative Plan would also demonstrate that OCHA is committed to preserving housing opportunities for victims of domestic violence, dating violence, and stalking.

Included below are the statutory provisions that OCHA should incorporate into its Administrative Plan. We have included suggestions for which chapters of the Administrative Plan should include VAWA's provisions. The statutory language has been edited without changing it substantively in anticipation that this proposed language can be incorporated into the Administrative Plan.

**Proposed Language to Include in the Administrative Plan:**

Definitions (Chapter 9) [42 U.S.C. § 13925(a)(6)-(8); 42 U.S.C. § 1437f(f)(8)-(11); Cal. Fam. Code § 6211]

"Domestic violence" is defined as felony or misdemeanor crimes of violence committed by:

- (1) a current or former spouse of the victim;
- (2) a person with whom the victim shares a child in common;
- (3) a person who is cohabitating with or has cohabitated with the victim as a spouse;
- (4) a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies;
- (5) any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction [i.e., California].

VAWA also protects persons who are covered by state law definitions of domestic violence. California law defines "domestic violence" as abuse perpetrated against the victim by:

- (1) The victim's spouse or former spouse.
- (2) Someone the victim lives with or lived with in the past.
- (3) Someone the victim is dating or has dated.
- (4) Someone the victim has a child with.

(5) Someone to whom the victim is related by blood, marriage, or adoption (including the victim's parent, grandparent, child, grandchild, brother, or sister)

"Dating violence" is defined as violence committed by a person--

(A) who is or has been in a social relationship of a romantic or intimate nature with the victim; AND

(B) where the existence of such a relationship shall be determined based on a consideration of the following factors:

(i) The length of the relationship.

(ii) The type of relationship.

(iii) The frequency of interaction between the persons involved in the relationship.

"Stalking" is defined as:

(A) (i) to follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate another person; OR

(ii) to place under surveillance with the intent to kill, injure, harass, or intimidate another person;

AND

(B) in the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to--

(i) that person;

(ii) a member of the immediate family of that person; OR

(iii) the spouse or intimate partner of that person

"Immediate family member" means, with respect to a person --

a. a spouse, parent, brother or sister, or child of that person, or an individual to whom that person stands in loco parentis; or

b. any other person living in the household of that person and related to that person by blood or marriage.

#### Denial of Admission (Chapter 4)

That an applicant is or has been a victim of domestic violence, dating violence, or stalking is not an appropriate basis for denial of program assistance or for denial of admission, if the applicant otherwise qualifies for admission. [42 U.S.C. §§ 1437f(c)(9)(A) and (o)(6)(B).]

Nothing in this section shall be construed to supersede any provision of any Federal, State, or local law that provides greater protection than this section for victims of domestic violence, dating violence, or stalking. [42 U.S.C. §§ 1437f(c)(9)(C)(vi) and (o)(6)(B).]

#### Termination of Rental Assistance by OCHA (Chapter 20)

An incident or incidents of actual or threatened domestic violence, dating violence, or stalking shall not be good cause for terminating the assistance of the victim of such violence. *[42 U.S.C. § 1437f(c)(9)(B).]*

The Housing Authority may not terminate assistance to a participant in the voucher program on the basis of an incident or incidents of actual or threatened domestic violence, dating violence, or stalking against that participant. *[42 U.S.C. § 1437f(o)(20)(A).]*

Criminal activity directly relating to domestic violence, dating violence, or stalking shall not be considered a serious or repeated violation of the lease by the victim or threatened victim of that criminal activity justifying termination of assistance to the victim or threatened victim. *[42 U.S.C. § 1437f(o)(20)(B).]*

Criminal activity directly relating to domestic violence, dating violence, or stalking shall not be considered cause for termination of assistance for any participant or immediate member of a participant's family who is a victim of the domestic violence, dating violence, or stalking. *[42 U.S.C. § 1437f(o)(20)(C).]* Criminal activity directly relating to domestic violence, dating violence, or stalking, engaged in by a member of a tenant's household or any guest or other person under the tenant's control, shall not be cause for termination of assistance, if the tenant or an immediate member of the tenant's family is the victim or threatened victim of that domestic violence, dating violence, or stalking. *[42 U.S.C. §§ 1437f(c)(9)(C)(i) and (d)(1)(B)(iii)(I).]*

#### Bifurcation (Splitting) of Rental Assistance (Chapter 20)

Notwithstanding this provision, or any Federal, State, or local law to the contrary, the Housing Authority may terminate assistance to, or an owner or manager may bifurcate a lease under this provision, or remove a household member from a lease under this provision, without regard to whether the household member is a signatory to a lease, in order to evict, remove, terminate occupancy rights, or terminate assistance to any individual who is a tenant or lawful occupant and who engages in criminal acts of physical violence against family members or others, without terminating assistance to, or otherwise penalizing, the victim of such violence who is also a tenant or lawful occupant. Such eviction shall be effected in accordance with the procedures prescribed by Federal, State, and local law for the termination of leases or assistance under the relevant program of HUD-assisted housing. *[42 U.S.C. § 1437f(d)(1)(B)(iii)(II).]*

Nothing in this Plan may be construed to limit the authority of the Housing Authority to terminate voucher assistance to individuals who engage in criminal acts of physical violence against family members or others. *[42 U.S.C. § 1437f(o)(20)(D)(i).]*

#### Honoring of Court Orders (Chapter 20)

Nothing in this Plan may be construed to limit the authority of the Housing Authority, when notified, to honor court orders addressing rights of access or control of the property, including civil protection orders issued to protect the victim and issued to address the distribution or possession of property among the household members in cases where a family breaks up. [42 U.S.C. §§ 1437f(c)(9)(C)(iii), (d)(1)(B)(iii)(III), and (o)(20)(D)(ii).]

#### Lease Violations Unrelated to Domestic Violence (Chapter 20)

Nothing in this provision limits any otherwise available authority of the Housing Authority to terminate assistance to a tenant for any violation of a lease not premised on the act or acts of violence in question against the tenant or a member of the tenant's household, provided that the Housing Authority does not subject an individual who is or has been a victim of domestic violence, dating violence, or stalking to a more demanding standard than other tenants in determining whether to terminate. [42 U.S.C. §§ 1437f(d)(1)(B)(iii)(IV), and (o)(20)(D)(iii).]

#### Cases in Which Tenant Poses Actual and Imminent Threat to Other Tenants (Chapter 20)

Nothing in this provision may be construed to limit the authority of the Housing Authority to terminate assistance to a tenant if the Housing Authority can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the property or Housing Authority if that tenant is not evicted or terminated from assistance. [42 U.S.C. §§ 1437f(c)(9)(C)(v), (d)(1)(B)(iii)(V), and (o)(20)(D)(iv).]

#### Relationship to Other Laws (Chapter 20)

Nothing in this Plan shall be construed to supersede any provision of any Federal, State, or local law that provides greater protection than this section for victims of domestic violence, dating violence, or stalking. [42 U.S.C. §§ 1437f(c)(9)(C)(vi), (d)(1)(B)(iii)(VI), and (o)(20)(D)(v).]

#### Rights and Obligations of Section 8 Owners Under VAWA (Chapter 19)

##### 1. Restrictions on Terminations of Tenancies

During the term of a lease under the voucher program, the owner shall not terminate the tenancy except for serious or repeated violation of the terms and conditions of the lease, for violation of applicable Federal, State, or local law, or for other good cause, and an incident or incidents of actual or threatened domestic violence, dating violence, or stalking will not be construed as a serious or repeated violation of the lease by the victim or threatened victim of that violence and will not be good cause for terminating the tenancy or occupancy rights of the victim of such violence. [42 U.S.C. §§ 1437f(d)(B)(ii) and (o)(7)(C).]

Criminal activity directly relating to domestic violence, dating violence, or stalking, engaged in by a member of a tenant's household or any guest or other person under the tenant's control, shall not be cause for termination of the tenancy or occupancy rights, if the tenant or an

immediate member of the tenant's family is the victim or threatened victim of that domestic violence, dating violence, or stalking. [42 U.S.C. §§ 1437j(c)(9)(C)(i) and (o)(7)(D).] The lease shall provide that, during the term of the lease, criminal activity directly relating to domestic violence, dating violence, or stalking, engaged in by a member of a tenant's household or any guest or other person under the tenant's control, shall not be cause for termination of the tenancy or occupancy rights, if the tenant or an immediate member of the tenant's family is a victim of that domestic violence, dating violence, or stalking. [42 U.S.C. § 1437j(d)(B)(iii).]

## 2. Authorization of a Section Owner to Bifurcate (Split) a Lease

Notwithstanding this provision, an owner or manager may bifurcate a lease in order to evict, remove, terminate occupancy rights, or terminate assistance to any individual who is a tenant or lawful occupant and who engages in criminal acts of physical violence against family members or others, without evicting, removing, terminating assistance to, or otherwise penalizing the victim of such violence who is also a tenant or lawful occupant. Such eviction shall be effected in accordance with the procedures prescribed by Federal, State, and local law for the termination of leases or assistance under the relevant program of HUD-assisted housing. [42 U.S.C. §§ 1437j(c)(9)(C)(ii), (d)(B)(iii)(II), and (o)(7)(D)(ii).]

## 3. Responsibility of Section 8 Owners to Honor Court Orders

Nothing in this provision may be construed to limit the authority of an owner or manager, when notified, to honor court orders addressing rights of access to or control of the property, including civil protection orders issued to protect the victim and issued to address the distribution or possession of property among the household members in cases where a family breaks up. [42 U.S.C. §§ 1437j(c)(9)(C)(iii), (d)(B)(iii)(III), and (o)(7)(D)(iii).]

## 4. Section 8 Owner's Authority to Evict for Lease Violations Unrelated to Domestic Violence

Nothing in this provision limits any otherwise available authority of an owner or manager to evict a tenant for any violation of a lease not premised on the act or acts of violence in question against the tenant or a member of the tenant's household, provided that the owner or manager does not subject an individual who is or has been a victim of domestic violence, dating violence, or stalking to a more demanding standard than other tenants in determining whether to evict. [42 U.S.C. §§ 1437j(c)(9)(C)(iv), (d)(B)(iii)(IV), and (o)(7)(D)(iv).]

## 5. Section 8 Owner's Authority to Evict Tenant Who Poses Actual and Imminent Threat

Nothing in this provision may be construed to limit the authority of an owner or manager to evict any tenant or lawful occupant if the owner or manager can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the property if that tenant is not evicted. [42 U.S.C. §§ 1437(c)(9)(C)(v), (d)(B)(iii)(V), and (o)(7)(D)(v).]

#### 6. Relationship to Other Laws

Nothing in this Plan shall be construed to supersede any provision of any Federal, State, or local law that provides greater protection than this section for victims of domestic violence, dating violence, or stalking. [42 U.S.C. §§ 1437(c)(9)(C)(vi), (d)(B)(iii)(VI), and (o)(7)(D)(vi).]

#### Portability (Chapter 11) [42 U.S.C. § 1437(f)(5).]

A family may not receive a voucher from the Housing Authority and move to another jurisdiction under the tenant-based assistance program if the family has moved out of the assisted dwelling unit of the family in violation of a lease, except that a family may receive a voucher from the Housing Authority and move to another jurisdiction under the tenant-based assistance program if the family has complied with all other obligations of the section 8 program and has moved out of the assisted dwelling unit in order to protect the health or safety of an individual who is or has been the victim of domestic violence, dating violence, or stalking and who reasonably believed he or she was imminently threatened by harm from further violence if he or she remained in the assisted dwelling unit.

#### Certification of Domestic Violence, Dating Violence, or Stalking (Chapter 9)

If an individual seeks to assert the protections of the Violence Against Women Act, the owner, manager, or the Housing Authority may request that an individual certify that the individual is a victim of domestic violence, dating violence, or stalking, and that the incident or incidents in question are bona fide incidents of such actual or threatened abuse and meet the requirements set forth in this Plan. The individual shall provide such certification within 14 business days after the individual receives a written request for such certification from the owner, manager, or Housing Authority. [42 U.S.C. § 1437(cc)(1)(A).]

If the individual does not provide the certification within 14 business days after the individual receives a request in writing for such certification from the owner, manager, or Housing Authority, nothing in this Plan may be construed to limit the authority of the owner or manager to evict, or the Housing Authority to terminate voucher assistance for, the tenant or lawful occupant that commits violations of a lease. The owner, manager, or Housing Authority may extend the 14-business-day deadline at their discretion. [42 U.S.C. § 1437(cc)(1)(B).]



An individual may satisfy the certification requirement in any of the following ways –

1. completing a HUD-approved certification form verifying that the individual is a victim of domestic violence, dating violence, or stalking, and that the incident or incidents in question are bona fide incidents of actual or threatened abuse. Such certification shall include the name of the perpetrator; OR
2. providing the requesting owner, manager, or Housing Authority with documentation signed by an employee, agent, or volunteer of a victim service provider, an attorney, or a medical professional, from whom the victim has sought assistance in addressing domestic violence, dating violence, or stalking, or the effects of the abuse, in which the professional attests under penalty of perjury (28 U.S.C. § 1746) to the professional's belief that the incident or incidents in question are bona fide incidents of abuse, and the victim of domestic violence, dating violence, or stalking has signed or attested to the documentation; or
3. producing a Federal, State, tribal, territorial, or local police or court record. *[42 U.S.C. § 1437f(ee)(1)(C).]*

Nothing in this Plan shall be construed to require the owner, manager, or Housing Authority to demand that an individual produce official documentation or physical proof of the individual's status as a victim of domestic violence, dating violence, or stalking in order to receive any of the benefits provided in this Plan. At their discretion, the owner, manager, or Housing Authority may provide benefits to an individual based solely on the individual's statement or other corroborating evidence. *[42 U.S.C. § 1437f(ee)(1)(D).]*

Nothing in this Plan shall be construed to supersede any provision of any Federal, State, or local law that provides greater protection than this section for victims of domestic violence, dating violence, or stalking. *[42 U.S.C. § 1437f(ee)(1)(F).]*

Confidentiality (Chapter 9) *[42 U.S.C. § 1437f(ee)(2)(A).]*

All information provided to the owner, manager, or Housing Authority pursuant to the certification requirement, including the fact that an individual is a victim of domestic violence, dating violence, or stalking, shall be retained in confidence by the owner, manager, or Housing Authority, and shall neither be entered into any shared database nor provided to any related entity, except to the extent that disclosure is –

1. requested or consented to by the individual in writing;
2. required for use in an eviction proceeding under 42 U.S.C. § 1437f(c)(9), (d)(1)(B(ii), (d)(1)(B)(iii), (o)(7)(C), (o)(7)(D), or (o)(20), or

3. otherwise required by applicable law.

Voucher Program - Notification (Chapter 10) [42 U.S.C. § 1437f(ee)(1)(B).]

The Housing Authority shall provide notice to tenants assisted under the voucher program of their rights under 42 U.S.C. §§ 1437f(c)(9), (d)(1)(B)(ii), (d)(1)(B)(iii), (o)(7)(C), (o)(7)(D), (o)(20), (r)(5), and (ee), including their right to confidentiality and the limits thereof, and to owners and managers of their rights and obligations under 42 U.S.C. §§ 1437f(c)(9), (d)(1)(B)(ii), (d)(1)(B)(iii), (o)(7)(C), (o)(7)(D), (o)(20), (r)(5), and (ee).

**OCHA'S Reasonable Accommodation Policies**

**Administrative Plan**

Chapter 1.3D, Statement of Policies and Objectives, Reasonable Accommodation Policy (page 3):

This section includes a statement that "If providing an accommodation would result in a fundamental alteration in the nature of a HCVP or an undue financial or administrative burden, then OCHA need not provide that accommodation."

COMMENT:

While the housing authority is technically correct, it should note that, while it does not have to provide an unduly burdensome accommodation, it is required, if it find the request unreasonable, to suggest an alternative accommodation.

Chapter 1.3G, Statement of Policies and Objectives, Reasonable Accommodation Policy, (page 4):

"OCHA will maintain lists of available housing submitted by owners in all neighborhoods within OCHA's jurisdiction to ensure "greater mobility and housing choice" to very-low income households served by this agency. The lists will be provided at the front desk, for families who call in and request it, and at briefings."

COMMENT:

In Chapter 3, Section 2 of the Administrative Plan, OCHA states that it will provide lists specifically of accessible housing for people with disabilities. This section should also include that information in order to ensure that disabled participants of the voucher program are aware of the availability of such a list. In addition, this section should be clear that if a disabled person

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February 27, 2008  
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needs assistance in locating accessible units. OCHA should, as a reasonable accommodation, provide it.

Chapter 3.2A1, Outreach Procedures, Disabilities (page 12)

“1. Adopt a suitable means to assure that the notice reaches eligible individuals with disabilities in providing notice of the availability and nature of housing assistance for low-income families under HCVP requirements;”

COMMENT:

We applaud the outreach efforts OCHA is making in order to ensure equal opportunity for people with disabilities. However, we also encourage OCHA to specify some of the means by which the agency will reach such individuals. For example, this section should include outreach to fair housing organizations and formats that are accessible to vision and hearing-impaired individuals, making clear that any list is only inclusive and not exhaustive of the types of outreach OCHA will do. All outreach, regardless of targeting, should make prospective participants aware of the right to request reasonable accommodation. See PIH Notice 2006-13. Education of landlords on the rights of people with disabilities would also be helpful on the rights of people with disabilities and the obligation to provide reasonable accommodation. Some examples might be education on the rights of people with disabilities to have service animals and to have secure and accessible locations for durable medical equipment such as Power Operated Vehicles (POVs).

Chapter 4.5G Eligibility for Admission, Other Criteria for Admission (page 18)

“OCHA may verify a person's disability only to the extent necessary, to ensure that applicants are qualified for the housing for which they are applying; that applicants are qualified for deductions used in determining adjusted income; that applicants are entitled to any preference they may claim; and that applicants who have requested a reasonable accommodation have a need for the requested accommodation. OCHA may require documentation of the manifestation of the disability that causes a need for a specific accommodation or accessible unit.”

COMMENT:

This section should cross reference to Chapter 9, Verification Procedures for reasonable accommodations. See comments for Chapter 9.

Chapter 9, Verification Procedures

COMMENT:

OCHA should insert a new section into this chapter regarding verification procedures for reasonable accommodation. This is necessary, as HUD has issued specific guidance on verification procedures that comports with the Fair Housing Act<sup>1</sup>, the Americans with Disabilities Act<sup>2</sup> and the Rehabilitation Act<sup>3</sup>.

This guidance can be found in the HUD/DOJ Joint Statement on "Reasonable Accommodations under the Fair Housing Act," pp. 12-14, May 17, 2004 as well as PIH Notice 2006-13 (cross-referencing PIH Notice 2003-31). The statement instructs that if a person's disability is obvious or known, and the need for the requested accommodation is known, the PHA may not ask for any more information. If the disability is known or obvious, but the need for the accommodation is not readily apparent, then the PHA may ask for only information necessary to evaluate the need for the accommodation. Thus in some cases, verification is unnecessary.

If the participant's disability is not apparent, then verification will be necessary. The PHA should allow the individual to self-certify depending on the situation. For example, they may provide proof of SSI or SSDI benefits in order to certify. The HUD/DOJ statement also states that "a doctor or other medical professional, a peer support group, a non-medical service agency, or a reliable third party who is in a position to know about the individual's disability." Thus, the myriad of persons who may verify the disability for purposes of reasonable accommodation is broad. This is important because people with disabilities may be in between doctors, have a hard time visiting the same doctor, or not even be receiving medical care. Thus, it is important the Administrative Plan allow certain participants to self-certify, and to note the broad range of knowledgeable persons that may certify a person's need for a reasonable accommodation.

Chapter 10.2 Briefing of Families and Issuance of Housing Choice Vouchers, Briefing Attendance Requirement (page 65)

COMMENT:

This section should specifically state that OCHA will provide reasonable accommodation of a person's disability with regard to the briefing attendance requirement as needed, such as by allowing a phone session, providing a sign language interpreter, or an at home session. See PIH Notice 2006-13.

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<sup>1</sup> 42 U.S.C. §3604(f)

<sup>2</sup> 42 U.S.C. §12132

<sup>3</sup> 29 U.S.C. §794

Chapter 12. Locating Suitable Housing, (page 74)

COMMENT:

As noted in the comments to Chapter 1.3 regarding lists of available housing, the PHA should keep a list of known accessible units in the area.

Glossary of Terms in Subsidized Housing (page 160)

“PERSON WITH DISABILITIES. A person who has a disability as defined in 42 U.S.C. 423 or a developmental disability as defined in 42 U.S.C. 6001. Also includes a person who is determined, under HUD regulations, to have a physical or mental impairment that is expected to be of long-continued and indefinite duration, substantially impedes the ability to live independently, and is of such a nature that the ability to live independently could be improved by more suitable housing conditions. For purposes of reasonable accommodation and program accessibility for persons with disabilities, means an “individual with handicaps” as defined in 24

CFR 8.3. Definition does not exclude persons who have AIDS or conditions arising from AIDS, but does not include a person whose disability is based solely on drug or alcohol dependence (for low-income housing eligibility purposes). See “individual with handicaps”.”

COMMENT:

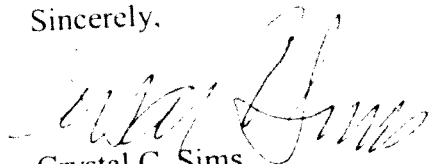
This definition must be corrected in two ways. First, the California Fair Employment and Housing Act provides a slightly different definition of disability for the purposes of reasonable accommodation, which OCHA should adhere to. That definition, codified at California Government Code 12926, only requires that the disability “limits a major life activity” as opposed to “substantially limits one or more major life activities” as stated in 24 C.F.R. 8.3.

Also, the ADA only excludes *current* users of illegal drugs or alcohol (the Rehabilitation Act and Fair Housing Act do not state any exclusion). 42 U.S.C. § 12132. An individual with a disability can include someone who has successfully completed a drug rehabilitation program, is currently in such a program, or is mistakenly regarded as engaging in illegal drug use. 42 U.S.C. § 12210(b).

Jacqui Voss  
February 28, 2008  
Page Eighteen

Thank you for the opportunity to submit these comments. We look forward to discussing these issues with you in greater depth.

Sincerely,

A handwritten signature in black ink, appearing to read "Crystal C. Sims". The signature is fluid and cursive, with the first name "Crystal" being more prominent than the last name "Sims".

Crystal C. Sims  
Legal Aid Society of Orange County

Catherine Bishop  
Navneet Grewal  
Meliah Schultzman  
National Housing Law Project



# Housing & Community Services Department

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ORANGE COUNTY HOUSING AUTHORITY

April 2, 2008

Crystal C. Sims  
Legal Aid Society of Orange County  
2101 North Tustin Avenue  
Santa Ana, CA 92705

Dear Ms. Sims:

Thank you for submitting comments regarding Orange County Housing Authority's (OCHA's) Annual Public Housing Agency Plan for Fiscal Year 2008. It is our understanding that the Legal Aid Society of Orange County and the National Law Project contributed to this input. OCHA values your input and welcomes recommendations to enhance the quality and impact of its programs for the benefit of participating households and applicants.

Initial review of your comments indicates that most of the recommendations are related to policies and procedural issues or options that are delineated in OCHA's Administrative Plan. During 2007, OCHA managers established a goal to perform a major update of the Administrative Plan in 2008. To initiate this, OCHA contacted a respected national housing consultant firm and obtained an updated Administrative Plan template that ensures compliance with all current federal requirements. This document will serve as a foundation upon which local options and initiatives will be added.

A major consideration in updating the Administrative Plan will include a review of local discretionary policies and consultation with the H&CD Commission to provide guidance for potential modifications. We also invite the participation of the Legal Aid Society and the National Law Project in these discussions and will advise you of these meetings. During this process OCHA will discuss and/or incorporate related comments submitted in your letter and we intend for these meetings to be collaborative, and hope you will participate and provide input. This will be a major undertaking and is expected to take up to 10 months, resulting in a comprehensive review and updating of OCHA's Administrative Plan.

The following will address the comments raised in your letter of February 27, 2008:

- Resident Advisory Board (RAB). OCHA will forward your recommendation for additional RAB representation to the H&CD Commission for consideration. Please provide us the names of tenants who are interested in serving on the RAB, as indicated in your letter, and this information will also be shared with the H&CD Commission. If directed by the H&CD Commission, OCHA will also provide the opportunity for others to participate in the RAB, and develop potential outreach materials and selection criteria.
- Number of Authorized Vouchers. Thank you for commending OCHA's utilization rate.
- Payment Standards. OCHA currently has two Payment Standard Schedules (see attached). A basic Payment Standard applies to most cities and is set at 100% of the area Fair Market Rent (FMR). A higher Payment Standard at 105% of the FMR is allowed in designated high cost cities. OCHA monitors tenant success rates, number of leases per city, market rents, tenant rent burdens, and HUD funding to establish Payment Standard levels. These factors are evaluated when new Fair Market Rents are published and monitored quarterly. The Administrative Plan authorizes OCHA to modify Payment Standards to enhance program stability, optimize the success of families in using their Voucher, reduce rent burdens, and deconcentrate households. OCHA recently exercised this flexibility by creating the 105% level for high cost areas in May 2007.



Julia Bidwell, Interim Director  
1770 N. Broadway • Santa Ana, CA 92706 • (714) 480-2900 • Fax (714) 480-2803  
Orange County Housing Authority (714) 480-2700 • TDD (714) 480-2926  
<http://www.ochousing.org>

Attachment F- OCHA response

In establishing Payment Standards, OCHA utilizes internal and HUD reports to validate the most current tenant rent burdens. For example, a report available on HUD's website confirms that 89% of OCHA's assisted tenants currently pay 30% of income as their share of rent, 8% pay 31-40% of their income, and 3% pay over 41% of their income. By comparison, the Center on Budget and Policy Priorities reports that: *"Nationally, nearly half of Voucher families pay more than 30% of income and about one in five pay more than 40%".*

Other HUD reports indicate that (depending on bedroom size) 87% to 93% of OCHA-assisted units have gross rents (including utilities) that are less than or equal to OCHA's Payment Standards. In addition, OCHA's success rate for leasing families exceeds 80%, which is considered very good in the industry. These factors indicate that current Payment Standards are optimum for families to succeed in the current rental market. OCHA also has the ability to utilize Payment Standards up to 110% of FMR if needed for reasonable accommodation for a family with disabilities.

- Voucher Expirations. Your comments include a concern regarding participating families whose Vouchers expired and question if OCHA analyzed the characteristics of this group, and why they were unsuccessful in retaining their Voucher.

These Voucher expirations involve assisted tenants whose lease was terminated (either tenant wanted to relocate, rent increase was not acceptable, or other reasons). In such cases OCHA issues a new Housing Voucher and the family has 120 days to locate alternative housing. During 2007, more than 1,050 of these families were successful in locating and leasing another unit, while 158 failed to lease, and their Voucher expired. OCHA has not tracked the specific demographic characteristics or surveyed the reasons these families were unsuccessful because staffing, budget and timeliness issues require that we prioritize lease-up activities over some information gathering.

Although data for the above sub-group was not available, OCHA began to analyze demographic data for all expired Vouchers in July 2007. At that time, OCHA began to send a reminder and survey to all Voucher recipients, whose Voucher was going to expire. This mailing included new Voucher recipients and those who were previously assisted and were moving. As shown below, the characteristics of all persons whose Voucher expired are very similar to the overall representation of participants on the program:

<u>Expired Vouchers</u>	<u>Program Participants</u>
Elderly: 41%	Elderly: 44%
Disabled: 27%	Disabled: 23%
Family: 32%	Family: 33%

Letters to the above households were sent to arrive about 45 days prior to the Voucher expiration date, using the most recently reported address or the address used when the Voucher was issued. Unfortunately a large majority (60 out of 90) letters were returned by the post office as "undeliverable". Those who responded to the survey indicated the following reasons for not using their Housing Voucher:

- 56% changed their mind (about half preferred to reside with relatives)
- 18% did not have sufficient funds to pay security deposit
- 18% did not want to move and the property owner refused to participate in program
- 8% had credit or other issues - and their applications were rejected



- Procedural Violations. You requested information regarding: what kind of violations are most prevalent, what OCHA is doing to try and reduce this, and what the family characteristics (demographics) are. Typical "procedural" violations include failure to respond or comply with re-examination or inspection appointments, or those who leave without notice.

In such cases, clients are usually rescheduled twice before a final termination is processed. Those who respond are given alternative dates and times that will accommodate their needs or other arrangements (such as telephone interviews) are made. In addition, families are always entitled to an informal hearing regarding these terminations. OCHA does not have specific demographics for this group at this time and will attempt this analysis.

- Initial lease-up success rate. You requested information regarding the success rate for families that received a Housing Choice Voucher during 2007, reasons that families failed to lease-up, and these family characteristics.

The success rate for Families using their Voucher during 2007 was 83%. In addition, OCHA qualified for an additional 5 bonus points on its SEMAP score for meeting the goals of deconcentration, by leasing a high percentage of families in areas of low poverty levels. The reasons that families failed to lease were listed previously under "Voucher Expirations".

- Applicable to: Implementation of the Violence against Women Act (VAWA)
  - Attachment D. Thank you for your comments on OCHA's efforts regarding VAWA. You encourage OCHA to provide VAWA information in a manner that will not endanger victims and to meet separately with household members as needed during re-examinations and inspections to explain VAWA.
  - Information shared with perspective landlords. To avoid the chance of an abuser to track a victim's location, you suggest that OCHA tell applicants which parties (property owners/managers) will be contacted so that safety risks are identified.

Staff has received HUD's notifications regarding VAWA preliminary training. Recently, managers participated in additional VAWA training titled "Implementing the Violence Against Women Act in Public and Section 8 Housing". This training was provided by The National Law Center on Homelessness & Poverty and KnowledgePlex. Managers will use this information to develop in-house training for all staff that has contact with clients.

The balance of comments in your letter relate to OCHA's Administrative Plan and includes the following:

- Eligibility for Admission, Family Compensation, Live-in Aides (page 15)
- Split households Prior to Housing Choice Voucher (HCV) Issuance (page 16)
- HCV Briefing (page 65)
- HCV Issuance Determination for split households (page 105)
- Incorporating the Provisions for the Violence Against Women Act
- Proposed language to include in the Administrative Plan
- Denial of Admission (Chapter 4)
- Termination of rental assistance by OCHA (Chapter 20)
- Bifurcation (splitting) of Rental Assistance (Chapter 20)
- Honoring of Court Orders (Chapter 20)
- OCHA's reasonable accommodation policies

Crystal Sims  
April 2, 2008  
Page four

As indicated in this letter, we will address the above listed comments and refer to your recommendations as we update the Administrative Plan, and welcome your active participation in this project. You will be advised when these project meetings begin, approximately during June 2008.

Please let me know if you have additional questions or concerns regarding these responses to your comments. Also, I assume you will be sharing this information with the National Law Project and I extend the same invitation to their representatives, if they wish to provide input regarding OCHA's Administrative Plan.

Sincerely,

A handwritten signature in cursive script that reads "John Hambuch".

John Hambuch  
Manager,  
Orange County Housing Authority

File: Legal Aid Society

## Plan

## Table Library

**Component 7**  
**Capital Fund Program Annual Statement**  
**Parts I, II, and II**

**Annual Statement**  
**Capital Fund Program (CFP) Part I: Summary**

Capital Fund Grant Number      FFY of Grant Approval: (MM/YYYY)

☐ Original Annual Statement

Line No.	Summary by Development Account	Total Estimated Cost
1	Total Non-CGP Funds	
2	1406 Operations	
3	1408 Management Improvements	
4	1410 Administration	
5	1411 Audit	
6	1415 Liquidated Damages	
7	1430 Fees and Costs	
8	1440 Site Acquisition	
9	1450 Site Improvement	
10	1460 Dwelling Structures	
11	1465.1 Dwelling Equipment-Nonexpendable	
12	1470 Nondwelling Structures	
13	1475 Nondwelling Equipment	
14	1485 Demolition	
15	1490 Replacement Reserve	
16	1492 Moving to Work Demonstration	
17	1495.1 Relocation Costs	
18	1498 Mod Used for Development	
19	1502 Contingency	
20	<b>Amount of Annual Grant (Sum of lines 2-19)</b>	
21	Amount of line 20 Related to LBP Activities	
22	Amount of line 20 Related to Section 504 Compliance	
23	Amount of line 20 Related to Security	
24	Amount of line 20 Related to Energy Conservation Measures	

**Annual Statement**  
**Capital Fund Program (CFP) Part II: Supporting Table**

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost

**Annual Statement**

**Capital Fund Program (CFP) Part III: Implementation Schedule**

Development Number/Name HA-Wide Activities	All Funds Obligated (Quarter Ending Date)	All Funds Expended (Quarter Ending Date)

**Optional Table for 5-Year Action Plan for Capital Fund (Component 7)**

Complete one table for each development in which work is planned in the next 5 PHA fiscal years. Complete a table for any PHA-wide physical or management improvements planned in the next 5 PHA fiscal year. Copy this table as many times as necessary. Note: PHAs need not include information from Year One of the 5-Year cycle, because this information is included in the Capital Fund Program Annual Statement.

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
Description of Needed Physical Improvements or Management Improvements		Estimated Cost		Planned Start Date (HA Fiscal Year)
Total estimated cost over next 5 years				

